

**From:** [Emily Knodell](#)  
**To:** [Ashcraft, Jennifer, Celanese](#)  
**Subject:** RE: Technical Review -- FOP O1628/Project 38922, Celanese Ltd./Bay City Plant  
**Date:** Friday, November 21, 2025 10:27:24 AM

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That sounds good to me. You are very welcome!

Emily L. Knodell  
Permit Reviewer  
TCEQ – APD – OP Section (Title V)  
(512) 239-3107



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**From:** Ashcraft, Jennifer, Celanese <jennifer.ashcraft@celanese.com>  
**Sent:** Friday, November 21, 2025 10:09 AM  
**To:** Emily Knodell <Emily.Knodell@tceq.texas.gov>  
**Subject:** RE: Technical Review -- FOP O1628/Project 38922, Celanese Ltd./Bay City Plant

Ok, that sounds great. I will get comments to you before December 10<sup>th</sup> for your review.

Thanks so much for your help!  
Jennifer

General Business Information

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**From:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
**Sent:** Friday, November 21, 2025 9:56 AM  
**To:** Ashcraft, Jennifer, Celanese <[jennifer.ashcraft@celanese.com](mailto:jennifer.ashcraft@celanese.com)>  
**Subject:** [EXT]RE: Technical Review -- FOP O1628/Project 38922, Celanese Ltd./Bay City Plant

**CAUTION: This email originated from outside Celanese. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Ms. Ashcraft,

From looking at the OP-2 and cover letter, the changes being requested are minor (updating two NSR dates) and will not impact the timing negatively. I will need to

update the WDP I sent for 38302 and will do so at the time I receive any other comments you would like me to address. From there, I will send a revised WDP that incorporates the new NSR dates as well as any WDP comments I receive from your review.

Best Regards,

Emily L. Knodell  
Permit Reviewer  
TCEQ – APD – OP Section (Title V)  
(512) 239-3107



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**From:** Ashcraft, Jennifer, Celanese <[jennifer.ashcraft@celanese.com](mailto:jennifer.ashcraft@celanese.com)>  
**Sent:** Thursday, November 20, 2025 9:50 AM  
**To:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
**Subject:** RE: Technical Review -- FOP O1628/Project 38922, Celanese Ltd./Bay City Plant

Emily, I don't have any concerns, but we are currently reviewing the WDP for project 38302 that you sent me last week. How will consolidating it with 38922 impact the timing?

Thank you for your review and consideration.

*Jennifer Ashcraft*

Environmental / Quality / Lab Manager



2001 FM 3057  
Bay City, TX 77414-2968  
Office: 979.216.0375  
[Jennifer.ashcraft@celanese.com](mailto:Jennifer.ashcraft@celanese.com)

General Business Information

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**From:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
**Sent:** Wednesday, November 19, 2025 2:11 PM

**To:** Ashcraft, Jennifer, Celanese <[jennifer.ashcraft@celanese.com](mailto:jennifer.ashcraft@celanese.com)>

**Subject:** [EXT]Technical Review -- FOP O1628/Project 38922, Celanese Ltd./Bay City Plant

**CAUTION: This email originated from outside Celanese. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Good afternoon Ms. Ashcraft,

My name is Emily Knodell, and I have been assigned to the Federal Operating Permit (FOP) *revision* application of Permit No. **O1628** for *Celanese Ltd./Bay City Plant*. This application has been assigned Project No. **38922**. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

**Please confirm the following:** Anytime a new project is received, processed and stamped in by APIRT then transmitted to Operating Permits Section, there is an opportunity to consolidate that project with a pending project already under review such that one project number is retained, and the other project is incorporated into the retained project. In this case, I am already reviewing Project 38302 for Celanese and therefore, I am proposing that we consolidate this new revision project (38922) into existing revision project (38302). Please confirm if you approve of consolidating the two projects into one.

In addition, I wanted to let you know that EPA has, on occasion, objected to Title V permits based on the following:

- a. NSR permit and PBR monitoring sufficiency –please refer to our periodic monitoring guidance for reference of monitoring that EPA has, so far, considered sufficient.
- b. Reference to confidential business information (CBI) in NSR permits and PBR submittals.
- c. High level terms in the SOP Applicable Requirement Summary Table. The high-level terms are sometimes used in SOPs when unit attribute forms have not yet been updated due to regulatory amendments.
- d. Accuracy of PBR information provided on the supplemental table and in the permit – please refer to Forms OP-PBRSUP and OP-REQ1 Instructions.

If you have any questions or concerns on any of these items or think you need to do any additional updates, let me know and we can discuss further.

Application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO/DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. Application updates that are

provided through email or physical mail require certification using an original signature OP-CRO1.

Please notify me when these updates have been submitted.

**As required on Form OP-1, question IV.D, please remember the FOP application and all application updates must be submitted to EPA Region 6 at [R6AirPermitsTX@epa.gov](mailto:R6AirPermitsTX@epa.gov) and to the TCEQ regional office having jurisdiction. This submittal information can be found on our website at [Where to Submit FOP Applications and Permit-Related Documents](#).**

Please review the "SOP Technical Review Fact Sheet" located at [http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\\_V/sop\\_wdp\\_factsheet.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_factsheet.pdf). This guidance contains important information regarding the review process and application update procedures. Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,

**Emily L. Knodell**

Permit Reviewer

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

MC-163, P.O. Box 13087

Austin, TX 78711-3087

[emily.knodell@tceq.texas.gov](mailto:emily.knodell@tceq.texas.gov)

Phone: (512) 239-3107

Fax: (512) 239-1400



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at [www.tceq.texas.gov/customersurvey](http://www.tceq.texas.gov/customersurvey)

## Texas Commission on Environmental Quality

Title V Existing

1628

### Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	BAY CITY PLANT
Does the site have a physical address?	Yes
Physical Address	
Number and Street	2001 FM 3057
City	BAY CITY
State	TX
ZIP	77414
County	MATAGORDA
Latitude (N) (##.#####)	28.861666
Longitude (W) (-###.#####)	96.019444
Primary SIC Code	2869
Secondary SIC Code	
Primary NAICS Code	325199
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN100258060
What is the name of the Regulated Entity (RE)?	CELANESE BAY CITY PLANT
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	2001 FM 3057
City	BAY CITY
State	TX
ZIP	77414
County	MATAGORDA
Latitude (N) (##.#####)	28.5142
Longitude (W) (-###.#####)	-96.011
Facility NAICS Code	
What is the primary business of this entity?	ORGANIC CHEMICALS MNFG

## Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN600130850
Type of Customer	Partnership
Full legal name of the applicant:	
Legal Name	Celanese Ltd.
Texas SOS Filing Number	8495110
Federal Tax ID	752622526
State Franchise Tax ID	17526225267
State Sales Tax ID	
Local Tax ID	
DUNS Number	26040709
Number of Employees	
Independently Owned and Operated?	Yes

## Responsible Official Contact

Person TCEQ should contact for questions about this application:	
Organization Name	CELANESE LTD
Prefix	MR
First	DONALD
Middle	
Last	BERTHELOT
Suffix	
Credentials	
Title	DIRECTOR PRODUCTION
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	PO BOX 509
Routing (such as Mail Code, Dept., or Attn:)	
City	BAY CITY
State	TX
ZIP	77404

Phone (###-###-####)	9792160314
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	9792160381
E-mail	donald.berthelot@celanese.com

## Duly Authorized Representative Contact

Person TCEQ should contact for questions about this application

Select existing DAR contact or enter a new contact.

New Contact

Organization Name

CELANESE LTD

Prefix

MS

First

Jennifer

Middle

Last

Ashcraft

Suffix

Credentials

Title

Environmental Manager

Enter new address or copy one from list

Mailing Address

Address Type

Domestic

Mailing Address (include Suite or Bldg. here, if applicable)

PO BOX 509

Routing (such as Mail Code, Dept., or Attn:)

City

BAY CITY

State

TX

Zip

77404

Phone (###-###-####)

9792160375

Extension

Alternate Phone (###-###-####)

Fax (###-###-####)

9792160383

E-mail

Jennifer.Ashcraft@celanese.com

## Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.	JENNIFER ASHCRAFT(CELANESE LTD... )
Organization Name	CELANESE LTD
Prefix	MS
First	JENNIFER
Middle	
Last	ASHCRAFT
Suffix	
Credentials	
Title	ENVIRONMENTAL MANAGER
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	PO BOX 509
Routing (such as Mail Code, Dept., or Attn:)	
City	BAY CITY
State	TX
ZIP	77404
Phone (###-###-####)	9792160375
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	9792160381
E-mail	jennifer.ashcraft@celanese.com

## Title V General Information - Existing

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	28 Deg 51 Min 42 Sec
3) Permit Longitude Coordinate:	96 Deg 1 Min 10 Sec
4) Is this submittal a new application or an update to an existing application?	New Application
4.1. What type of permitting action are you applying for?	Streamlined Revision
4.1.1. Are there any permits that should be voided upon issuance of this permit application through permit conversion?	No
4.1.2. Are there any permits that should be voided upon issuance of this permit application through permit consolidation?	No
5) Who will electronically sign this Title V application?	Duly Authorized Representative

6) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?

N/A

## Title V Attachments Existing

Attach OP-1 (Site Information Summary)

Attach OP-2 (Application for Permit Revision/Renewal)

[File Properties]

File Name

[OP-2.pdf](/ePermitsExternal/faces/file?fileId=277281)

Hash

4661529975A5E1D707377927F15A97303D0673519D304F28B3A4C3F44AC941C3

MIME-Type

application/pdf

Attach OP-REQ1 (Application Area-Wide Applicability Determinations and General Information)

[File Properties]

File Name

[OP-REQ1.pdf](/ePermitsExternal/faces/file?fileId=277282)

Hash

4103AFCDF9599411FF1F04C3774CDB8EE09739DB2A28F080726E5AE1F5BB6A31

MIME-Type

application/pdf

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

Attach OP-SUMR (Individual Unit Summary for Revisions)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

If applicable, attach OP-AR1 (Acid Rain Permit Application)

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name

<a href=/ePermitsExternal/faces/file?fileId=277280>Celanese  
O1628 Minor Revision.pdf</a>

Hash

098C14A954B22DE4C4B820D19B2CFC3E271F222A342FFB4F7A41875E3F6BBF47

MIME-Type

application/pdf

An additional space to attach any other necessary information needed to complete the permit.

## Expedite Title V

1) Per Texas Health and Safety Code, Section 382.05155,  
does the applicant want to expedite the processing of this  
application?

No

## Certification

I certify that I am the Duly Authorized Representative for this application and that, based on information and belief formed after reasonable inquiry, the statements and information on this form are true, accurate, and complete.

1. I am Donald A Berthelot, the owner of the STEERS account ER084362.
2. I have the authority to sign this data on behalf of the applicant named above.
3. I have personally examined the foregoing and am familiar with its content and the content of any attachments, and based upon my personal knowledge and/or inquiry of any individual responsible for information contained herein, that this information is true, accurate, and complete.
4. I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time.
5. I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.
6. I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcement of a state and/or federal environmental program and must be true and complete to the best of my knowledge.
7. I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.
8. I am knowingly and intentionally signing Title V Existing 1628.
9. My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEQ.

OWNER OPERATOR Signature: Donald A Berthelot OWNER OPERATOR

Account Number:

ER084362

Signature IP Address:

170.85.11.14

Signature Date:

2025-08-28

Signature Hash: 265670ECD9D3D5D9187F34A82840A2303E2F1249B964BDCF4BFAD9EF89F3192A  
Form Hash Code at time of Signature: A000FD8EC5A2B5D8C0399BF8BF3D4816AC02B705DAE69735005F5C4B28C8D13B

## Submission

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Reference Number:	The application reference number is 811090
Submitted by:	The application was submitted by ER084362/Donald A Berthelot
Submitted Timestamp:	The application was submitted on 2025-08-28 at 17:17:26 CDT
Submitted From:	The application was submitted from IP address 170.85.102.81
Confirmation Number:	The confirmation number is 674687
Steers Version:	The STEERS version is 6.92
Permit Number:	The permit number is 1628

## Additional Information

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Application Creator: This account was created by Meenu Pillai

Celanese Ltd.  
P.O. Box 509  
Bay City, TX 77404-0509



*Submitted Electronically via  
State of Texas Environmental Electronic Reporting System (STEERS)*

August 22, 2025

Texas Commission on Environmental Quality  
Air Permits Initial Review Team (APIRT), MC 161  
P. O. Box 13087  
Austin, Texas 78711-3087

**Re: Site Operating Permit No. O1628 Minor Revision Application  
Celanese Ltd., Bay City Plant  
Customer Reference Number: CN600130850  
Regulated Entity Number: RN100258060**

To Whom It May Concern:

Celanese Ltd., Bay City Plant (Celanese) is submitting a revision to Site Operating Permit No. O1628. This minor permit revision meets the criteria outlined in 30 TAC §122.215 and the application includes all the information required by 30 TAC §122.216.

Celanese seeks to update the following in the Title V Permit:

- 1) Incorporate renewed and amended New Source Review (NSR) Permit No. 4449 (TCEQ Project 371017) issued on 8/8/25 into Title V Permit O1628; and
- 2) Incorporate amended NSR Permit No. 4196 (TCEQ Project 375576) issued on 4/25/25 into Title V Permit O1628.

There are no regulatory changes associated with these NSR actions. The following forms are included in this submittal:

- OP-2: Application for Permit Revision/Renewal; and
- OP-REQ1: Application Area-Wide Applicability, Page 89.

If you have any questions about this submittal, please contact me at (979) 216-0375 or via email at [jennifer.ashcraft@celanese.com](mailto:jennifer.ashcraft@celanese.com).

Sincerely,

Jennifer Ashcraft  
Environmental Manager  
Celanese Ltd. Bay City Plant

Attachments

cc: Air Section Manager, TCEQ Region 12, 5425 Polk St, Ste H, Houston TX 77023-1452  
*Electronic Submittal to [R12APDMail@tceq.texas.gov](mailto:R12APDMail@tceq.texas.gov)*

EPA Region 6  
*Electronic Submittal to [R6AirPermitsTX@epa.gov](mailto:R6AirPermitsTX@epa.gov)*

**Federal Operating Permit Program  
Application for Permit Revision/Renewal  
Form OP-2 - Table 1  
Texas Commission on Environmental Quality**

Date:	August 2025		
Permit No.:	O1628		
Regulated Entity No.:	RN100258060		
Company / Area Name:	Celanese Ltd. / Bay City Plant		
For Submissions to EPA			
Has a copy of this application been submitted (or is being submitted) to EPA?	<input checked="" type="checkbox"/>	YES	<input type="checkbox"/> NO
<b>I. Application Type</b>			
Indicate the type of application:			
<input type="checkbox"/> Renewal			
<input checked="" type="checkbox"/> Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)			
<input type="checkbox"/> Significant Revision			
<input type="checkbox"/> Revision Requesting Prior Approval			
<input type="checkbox"/> Administrative Revision			
<input type="checkbox"/> Response to Reopening			
<b>II. Qualification Statement</b>			
For SOP Revisions Only	<input checked="" type="checkbox"/>	YES	<input type="checkbox"/> NO
For GOP Revisions Only	<input type="checkbox"/>	YES	<input type="checkbox"/> NO

**Federal Operating Permit Program**  
**Application for Permit Revision/Renewal**  
**Form OP-2 - Table 1 (continued)**  
**Texas Commission on Environmental Quality**

<b>III. Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or a change in regulations.)</b>													
Indicate all pollutants for which the site is a major source based on the site's potential to emit after the change is operated:													
<input checked="" type="checkbox"/>	VOC	<input type="checkbox"/>	NO <sub>x</sub>	<input type="checkbox"/>	SO <sub>2</sub>	<input type="checkbox"/>	PM <sub>10</sub>	<input type="checkbox"/>	CO	<input type="checkbox"/>	Pb	<input checked="" type="checkbox"/>	HAP
Other:													
<b>IV. Reference Only Requirements (For reference only)</b>													
Has the applicant paid emissions fees for the most recent agency fiscal year (September 1-August 31)?													
<input checked="" type="checkbox"/>	YES	<input type="checkbox"/>	NO	<input type="checkbox"/>	N/A								
<b>V. Delinquent Fees and Penalties</b>													
Notice: This form will not be processed until all delinquent fees and/or penalties owed the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and penalty protocol.													



**Application Area-Wide Applicability Determinations and General Information**  
**Form OP-REQ1 (Page 89)**  
**Federal Operating Permit Program**  
**Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
August 2025	O1628	RN100258060

For SOP applications, answer ALL questions unless otherwise directed.

- ◆ For GOP applications, answer ONLY these questions unless otherwise directed.

**XII. NSR Authorizations (continued) - (Attach additional sheets if necessary for sections XII.E-J.)**

- ◆ **H. Title 30 TAC Chapter 116 Permits, Special Permits, Standard Permits, Other Authorizations (Other Than Permits By Rule, PSD Permits, NA Permits) for the Application Area**

Authorization No.	Issuance Date	Authorization No.	Issuance Date	Authorization No.	Issuance Date
4449	08/08/2025				
4196	04/25/2025				

- ◆ **I. Permits by Rule (30 TAC Chapter 106) for the Application Area**

*A list of selected Permits by Rule (previously referred to as standard exemptions) that are required to be listed in the FOP application is available in the instructions.*

PBR No.	Version No./Date	PBR No.	Version No./Date	PBR No.	Version No./Date

- ◆ **J. Municipal Solid Waste and Industrial Hazardous Waste Permits with an Air Addendum**

Permit No.	Issuance Date	Permit No.	Issuance Date	Permit No.	Issuance Date

**Form OP-CRO1**  
**Certification by Responsible Official**  
**Federal Operating Permit Program**  
**Texas Commission on Environmental Quality**

All initial issuance, revision, renewal, and reopening permit application submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

<b>I. Identifying Information</b>
RN: RN100258060
CN: CN600130850
Account No.: MH-0009-H
Permit No.: O1628
Project No.: 38302
Area Name: Bay City Plant
Company Name: Celanese Ltd.
<b>II. Certification Type</b> <i>(Please mark appropriate box)</i>
<input checked="" type="checkbox"/> Responsible Official <span style="margin-left: 200px;"><input type="checkbox"/> Duly Authorized Representative</span>
<b>III. Submittal Type</b> <i>(Please mark appropriate box) (Only one response can be accepted per form)</i>
<input type="checkbox"/> SOP/TOP Initial Permit Application <span style="margin-left: 100px;"><input checked="" type="checkbox"/> Permit Revision, Renewal, or Reopening</span>
<input type="checkbox"/> GOP Initial Permit Application <span style="margin-left: 100px;"><input type="checkbox"/> Update to Permit Application</span>
<input type="checkbox"/> Other: _____

**Form OP-CRO1**  
**Certification by Responsible Official**  
**Federal Operating Permit Program**  
**Texas Commission on Environmental Quality**

All initial issuance, revision, and renewal permit application submittals requiring certification must be accompanied by this form. Updates to acid rain or CSAPR (other than public notice verification materials) must be certified prior to authorization of public notice for the draft permit.

<b>IV. Certification of Truth</b>			
<b>This certification does not extend to information which is designated by TCEQ as information for reference only.</b>			
I, <u>Donald Berthelot</u>		certify that I am the <u>RO</u>	
<i>(Certifier Name printed or typed)</i>		<i>(RO or DAR)</i>	
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete: <i>Note: Enter Either a Time Period or Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>			
Time Period: From <u>07/21/2025</u>		to <u>01/23/2026</u>	
<i>(Start Date)</i>		<i>(End Date)</i>	
Specific Dates: _____			
<i>(Date 1)</i>	<i>(Date 2)</i>	<i>(Date 3)</i>	<i>(Date 4)</i>
_____		_____	
<i>(Date 5)</i>	<i>(Date 6)</i>		
Signature: <u>DABerthelot</u>		Signature Date: <u>1-28-2026</u>	
Title: <u>Director Operations</u>			

**From:** Emily Knodell  
**To:** Ashcraft, Jennifer, Celanese  
**Cc:** Nelwyn Mohrmann; Audra Olson (Audra.Olson@TRICORDconsulting.com); Cardona, Beatriz, Wood  
**Subject:** RE: Working Draft Permit -- FOP O1628/Project 38302, Celanese Ltd./Bay City Plant  
**Date:** Thursday, January 29, 2026 11:40:31 AM  
**Attachments:** [image007.png](#)  
[image008.png](#)  
[image009.png](#)  
[image010.png](#)

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Received, thank you!

Emily L. Knodell  
Permit Reviewer  
TCEQ – APD – OP Section (Title V)  
(512) 239-3107



How are we doing? Fill out our online customer satisfaction survey at [www.tceq.texas.gov/customersurvey](http://www.tceq.texas.gov/customersurvey)

---

**From:** Ashcraft, Jennifer, Celanese <jennifer.ashcraft@celanese.com>  
**Sent:** Wednesday, January 28, 2026 10:31 AM  
**To:** Emily Knodell <Emily.Knodell@tceq.texas.gov>  
**Cc:** Nelwyn Mohrmann <nelwyn.mohrmann@tricordconsulting.com>; Audra Olson (Audra.Olson@TRICORDconsulting.com) <Audra.Olson@TRICORDconsulting.com>; Cardona, Beatriz, Wood <Beatriz.Cardona\_contractor@celanese.com>  
**Subject:** RE: Working Draft Permit -- FOP O1628/Project 38302, Celanese Ltd./Bay City Plant

Emily,

Please find an electronic copy of the signed OP-CRO1 attached. The original hard copy will be submitted to you via Certified Mail today.

Please note that the Utilities Unit is no longer owned or operated by Celanese. Please remove that process description. Celanese owns and operates the Vinyl Acetate Manufacturing Unit and the Shipping Unit at the Bay City Plant. Please see the following process descriptions.

The manufacturing of vinyl acetate involves four process steps:

1. A vapor phase reaction occurs in which ethylene, oxygen, and acetic acid are fed into a reactor which produces the raw vinyl acetate.
2. After the reaction occurs, the heavy ends are removed and sent to an acetic acid vaporizer. The vapors are sent to a distillation column in which acetic acid is removed and stored while the remaining heavy ends are sent to the utility's boilers.
3. Excess CO2 is removed from the reaction by use of a CO2 scrubber and absorber. The CO2 is removed to maintain the proper ethylene concentration in the reactor feed.
4. Purification of the raw vinyl acetate occurs by feeding raw vinyl acetate into an azeotrope column. Ethyl acetate drops to the bottom of the column and is sent to the utility's boilers. The light ends (top of the column) is sent through a series of columns to remove impurities and water. The final product is stored in a series of tanks. An additive (hydroquinone) is placed into the storage tanks to prevent the Vinyl Acetate from polymerizing.

The Shipping unit involves barge, rail, truck, and trailer loading and unloading:

Celanese operates the Shipping Unit, loading and unloading a variety of chemical products, by-products, and raw materials for three co-located facilities (Celanese, Oxea, and Roehm) from tank cars, tank trucks, trailers, and barges. Principal products currently manufactured and shipped at the co-located facilities include n-butyl acetate, isobutyl acetate, propyl acetate, n-butanol, iso-butanol, n-butylaldehyde, iso-butylaldehyde, propionaldehyde, propanol, acetaldehyde, vinyl acetate, synthetic Fatty Acids, synthetic and fatty aldehydes, and methyl methacrylate. Only acetaldehyde and vinyl acetate are manufactured by Celanese, all other materials are manufactured by Oxea and Roehm. The Shipping Unit is also responsible for unloading raw materials, including acetic acid and methanol, from barges, railcars, and tank trucks for the three co-located facilities.

If have any questions or need additional information, please let me know.

Thank you,

*Jennifer Ashcraft*

Environmental / Quality / Lab Manager



2001 FM 3057  
Bay City, TX 77414-2968  
Office: 979.216.0375  
[Jennifer.ashcraft@celanese.com](mailto:Jennifer.ashcraft@celanese.com)

**From:** Ashcraft, Jennifer, Celanese  
**To:** Emily Knodell; Nelwyn Mohrmann  
**Cc:** Audra Olson; Tammy Hartmann; Berthelot, Donald (Don), Celanese  
**Subject:** RE: Working Draft Permit -- FOP 01628/Project 38302, Celanese Ltd./Bay City Plant  
**Date:** Friday, January 23, 2026 10:50:59 AM  
**Attachments:** [image008.png](#)  
[image009.png](#)  
[image010.png](#)  
[image011.png](#)

Thank you, Emily.

I will need to update the process description below; Celanese has not operated the utilities for this plant since 2007. We do, however, have shipping operations. I will update the description and provide a signed OP-CRO1 next week.

Thank you!

*Jennifer Ashcraft*  
Environmental / Quality / Lab Manager  
  
2001 FM 3057  
Bay City, TX 77414-2968  
Office: 979.216.0375  
[Jennifer.ashcraft@celanese.com](mailto:Jennifer.ashcraft@celanese.com)

General Business Information

**From:** Emily Knodell <Emily.Knodell@tceq.texas.gov>  
**Sent:** Friday, January 23, 2026 10:10 AM  
**To:** Nelwyn Mohrmann <nelwyn.mohrmann@tricordconsulting.com>; Ashcraft, Jennifer, Celanese <jennifer.ashcraft@celanese.com>  
**Cc:** Audra Olson <audra.olson@tricordconsulting.com>; Tammy Hartmann <tammy.hartmann@tricordconsulting.com>  
**Subject:** [EXT]RE: Working Draft Permit -- FOP 01628/Project 38302, Celanese Ltd./Bay City Plant

**CAUTION: This email originated from outside Celanese. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Good morning Nelwyn,

Thank you for your review and approval on the WDP. Please resolve the following items by **01/30/2026**.

- Form OP-CRO1:** At this time, I would like to ask for the form OP-CRO1 certifying the changes made to the application. Please fill out the Time Period from 07/21/2025 to 01/23/2026. Please send me an electronic copy and the original, signed hardcopy. Alternatively, in lieu of the OP-CRO1, you can submit this email thread and attachments as an update to the application through STEERS. Any application updates that are submitted by the RO/DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. STEERS does not accept the Outlook ".msg" file type, but it does take PDFs.
- Process Description:** Please confirm if the process description I have below is still correct, as this is the latest one we have for Celanese Ltd./Bay City Plant. Although this is not required during a minor revision, it does help me when preparing my project summary to have a current process description on file. You can use the strikethrough feature in the text below if needed or just confirm if it is still up to date.

The plant is comprised of the following sections:

Utilities Unit

The main activities undertaken in the Utilities Unit consist of the following:

- Process water treatment and steam production
- Cooling tower operations
- Synthesis gas and hydrogen production for use by process units
- Waste stream collection, treatment, & destruction
- Storage of fuels for dispensing operations for site equipment and vehicles

Vinyl Acetate Manufacturing:

The manufacturing of vinyl acetate involves four process steps:

- A vapor phase reaction occurs in which ethylene, oxygen, and acetic acid are fed into a reactor which produces the raw vinyl acetate.
- After the reaction occurs, the heavy ends are removed and sent to an acetic acid vaporizer. The vapors are sent to a distillation column in which acetic acid is removed and stored while the remaining heavy ends are sent to the utility's boilers.
- Excess CO2 is removed from the reaction by use of a CO2 scrubber and absorber. The CO2 is removed in order to maintain the proper ethylene concentration in the reactor feed.
- Purification of the raw vinyl acetate occurs by feeding raw vinyl acetate into an azeotrope column. Ethyl acetate drops to the bottom of the column and is sent to the utility's boilers. The light ends (top of the column) is sent through a series of columns to remove impurities and water. The final product is stored in a series of tanks. An additive (hydroquinone) is placed into the storage tanks to prevent the Vinyl Acetate from polymerizing.

Let me know if you have any questions. Thank you!

Best Regards,

Emily L. Knodell  
Permit Reviewer  
TCEQ – APD – OP Section (Title V)  
(512) 239-3107

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**From:** Nelwyn Mohrmann <[nelwyn.mohrmann@tricordconsulting.com](mailto:nelwyn.mohrmann@tricordconsulting.com)>  
**Sent:** Monday, January 5, 2026 4:19 PM  
**To:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>; Ashcraft, Jennifer, Celanese <[jennifer.ashcraft@celanese.com](mailto:jennifer.ashcraft@celanese.com)>  
**Cc:** Audra Olson <[audra.olson@tricordconsulting.com](mailto:audra.olson@tricordconsulting.com)>; Tammy Hartmann <[tammy.hartmann@tricordconsulting.com](mailto:tammy.hartmann@tricordconsulting.com)>  
**Subject:** Fwd: Working Draft Permit -- FOP O1628/Project 38302, Celanese Ltd./Bay City Plant

Emily - we have reviewed the WDP and have no additional comments. Thank you for implementing all of our requested changes.

Best Regards,  
**Nelwyn Mohrmann**  
**TRICORD**  
402A West Palm Valley Blvd., PMB348  
Round Rock, TX 78664  
Office and Fax: 888.900.0746 x 725  
Cell (preferred): 512.968.7158  
E-mail: [Nelwyn.Mohrmann@TRICORDConsulting.com](mailto:Nelwyn.Mohrmann@TRICORDConsulting.com)  
Web: [www.TRICORDConsulting.com](http://www.TRICORDConsulting.com)

----- Forwarded message -----

**From:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
**Date:** Thu, Dec 18, 2025 at 2:47 PM  
**Subject:** RE: Working Draft Permit -- FOP O1628/Project 38302, Celanese Ltd./Bay City Plant  
**To:** Nelwyn Mohrmann <[nelwyn.mohrmann@tricordconsulting.com](mailto:nelwyn.mohrmann@tricordconsulting.com)>  
**Cc:** Ashcraft, Jennifer, Celanese <[jennifer.ashcraft@celanese.com](mailto:jennifer.ashcraft@celanese.com)>; Audra Olson ([Audra.Olson@TRICORDconsulting.com](mailto:Audra.Olson@TRICORDconsulting.com)) <[Audra.Olson@tricordconsulting.com](mailto:Audra.Olson@tricordconsulting.com)>; Tammy Hartmann <[tammy.hartmann@tricordconsulting.com](mailto:tammy.hartmann@tricordconsulting.com)>

Hello again,

Sending this because I made a typo in the due date year of my previous email below...it won't be 2025 anymore once we are in January of next year.

The sentence should read, "Please review the WDP and submit to me any comments you have by **January 3, 2026.**"

Best Regards,

Emily L. Knodell  
Permit Reviewer  
TCEQ – APD – OP Section (Title V)  
(512) 239-3107

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at [www.tceq.texas.gov/customersurvey](http://www.tceq.texas.gov/customersurvey)

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**From:** Emily Knodell  
**Sent:** Thursday, December 18, 2025 2:31 PM  
**To:** Nelwyn Mohrmann <[nelwyn.mohrmann@tricordconsulting.com](mailto:nelwyn.mohrmann@tricordconsulting.com)>  
**Cc:** Ashcraft, Jennifer, Celanese <[jennifer.ashcraft@celanese.com](mailto:jennifer.ashcraft@celanese.com)>; Audra Olson ([Audra.Olson@TRICORDconsulting.com](mailto:Audra.Olson@TRICORDconsulting.com)) <[Audra.Olson@tricordconsulting.com](mailto:Audra.Olson@tricordconsulting.com)>; Tammy Hartmann <[tammy.hartmann@tricordconsulting.com](mailto:tammy.hartmann@tricordconsulting.com)>  
**Subject:** RE: Working Draft Permit -- FOP O1628/Project 38302, Celanese Ltd./Bay City Plant

Good afternoon all,

Thank you for providing such a quick response. Please see below my response to your comments in **green text** and revised WDP "Version 2".

Please review the WDP and submit to me any comments you have by **January 3, 2025**. Since this is a follow-up review to the previously submitted and reviewed WDP, only comments concerning changes since the last WDP may be considered by TCEQ. Any comments outside the scope of the most recent changes should be submitted as a separate project.

**Response to Comments:**

- 251DTC and 251DTL have duplicate Unit IDs (applicable requirements tables, NSR by EU Table). Please remove. Additionally, these are LOADING/UNLOADING OPERATIONS and should not be listed as FUGITIVE EMISSION UNITS on the Unit Summary Table.

-Unit ID 251DTC (OP-UA12) was removed.

-Unit ID 251DTL (OP-UA12) was removed.

- 251DTC and 251DTL still have high level MACT EEEE requirements in the permit. Please remove.

-High level MACT EEEE should now be gone for both units.

- Upon review, Celanese does need to create a second truck loading shipping ID: 251DTL2. An updated OP-UA4 is attached in support of this request.

-I added New Unit ID, 251DTL2 from the OP-UA4 provided on 12/17. It has 30 TAC Chapter 115 Loading & Unloading of VOC applicability (Index R5211-CVS and newly added R5211-E) and 40 CFR Part 63, Subpart EEEE applicability (Index 63EEEE-1. I did not add 63EEEE-2 as you requested in your note below).

○ Change found on Draft pages 15 & 16 (Unit Summary Tab), 32, 33 (Applicable Requirements), and 68 (NSR Authorization References by Emission Unit).

-I also added the four PCAs as listed in your OP-SUMR, NSR 4449, and PBRs 106.473/09/04/2000, 106.261/11/01/2003 [142397], 106.262/11/01/2003 [142397].

- Change found on Draft page 68 (NSR Authorization References by Emission Unit).
- 251DTC and future 251DTL2 - There should only be one operating scenario / SOP Index No. associated with 251DTC and 251DTL for MACT EEEE – 63EEEE-1. Please remove the second operating scenario as it has no applicable requirements, it was just documenting a negative applicability scenario.
  - I removed the other Index number, 63EEEE-2.
- 251DTL - Celanese requested the removal of HON Group 2 applicability and the addition of HON Group 1 applicability (OP-UA4 provided in initial application and is in the attached updated OP-UA4)
  - I deleted Index 63G-RACK-GRP2 as requested in your OP-REQ3 (Table 2).
  - I added Index 63G-G1TR (40 CFR 63 Subpart G Group 1 Transfer Rack applicability from your OP-UA4).
  - Change found on Draft pages 15 (Unit Summary), 31 and 68 (NSR Authorization References by Emission Unit).
- 251DTC (SOP Index R5211-CVS) – citations 115.216(3)(A)(i) and (iii) were added under recordkeeping. These were manually removed during the renewal, as they do not apply to railcars. Please remove 115.216(3)(A)(i) and (iii) from recordkeeping requirements.
  - I removed 115.216(3)(A)(i) and (iii) from recordkeeping requirements.
- 251DTC (SOP Index 63G-G1TR) – citation 63.152(g)(1) was added under monitoring, recordkeeping, and reporting. These were manually removed during the renewal, as they do not apply to the facility since they are not utilizing the alternative provisions. Please remove.
  - I manually removed the following to carry forward the manual changes made in Renewal Project 34629:
    - Monitoring/Testing: § 63.152(g)(1)(i), [G]§ 63.152(g)(1)(ii), § 63.152(g)(1)(iii), § 63.152(g)(1)(iv), and [G]§ 63.152(g)(1)(v).
    - Recordkeeping: § 63.152(g)(1), § 63.152(g)(1)(i), [G]§ 63.152(g)(1)(ii), § 63.152(g)(1)(iii), § 63.152(g)(1)(iv), [G]§ 63.152(g)(1)(v), § 63.152(g)(2), § 63.152(g)(2)(i), § 63.152(g)(2)(ii), and § 63.152(g)(2)(iii).
    - Reporting: § 63.152(g)(1), § 63.152(g)(2)(i), and § 63.152(g)(2)(ii).
- GRP-OLDST5K – Please update the SOP Index No. to 63EEEE-2 for MACT EEEE.
  - I updated the Index number from "63EEEE-3" to "63EEEE-2".
  - Change found on Draft Page 16 (Unit Summary) and 50 (Applicable Requirements).
- 251DM1205 - Celanese would like to retain NSPS A and MACT A applicability for the shipping flare. Additionally, PBR 106.476 needs to be added as an NSR authorization. An updated OP-UA7 is attached in support of these requests.
  - I added Index 60A-AIR for 40 CFR Part 60, Subpart A applicability and Index 63A-AIR for 40 CFR Part 63, Subpart A applicability based on the OP-UA7 provided.
  - Change found on Draft Page 14 (Unit Summary) and 26 (Applicable Requirements).
  - PBR 106.476/09/04/2000 has also been added as a PCA to the unit.
  - Change found on Draft Page 68 (NSR Authorization References by Emission Unit).
- TOTES - does not have any applicable requirement and therefore should not be listed in the permit. It should only be listed in the OP-PBRSUP form. We've updated the attached OP-2 to reduce the confusion.
  - I have removed this from the permit.
- Celanese would like to combine the fugitive IDs of 251AF and 251F into one source ID (Shipping Area Fugitives) with NSPS VV, MACT H, and MACT EEEE applicability. An updated OP-UA12 workbook is attached in support of this request.
  - I have updated the unit ID No. from 251AF to 251F and its unit name to "shipping area fugitives". I added 40 CFR Part 60, Subpart VV (60VV-ALL), 40 CFR Part 63, Subpart EEEE (Index 63EEEEH-ALL). I also added 40 CFR Part 63, Subpart H (Index 63H-ALL) based on the UA 12 data provided.
  - Change found on Draft Page 16 (Unit Summary), 34-50 (Applicable Requirements Summary) and 68 (NSR Authorization References by Emission Unit).

Let me know if you have any questions. Thank you!

Best Regards,

Emily L. Knodell  
Permit Reviewer  
TCEQ – APD – OP Section (Title V)  
(512) 239-3107

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**From:** Nelwyn Mohrmann <[nelwyn.mohrmann@tricordconsulting.com](mailto:nelwyn.mohrmann@tricordconsulting.com)>  
**Sent:** Wednesday, December 17, 2025 1:31 PM  
**To:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
**Cc:** Ashcraft, Jennifer, Celanese <[jennifer.ashcraft@celanese.com](mailto:jennifer.ashcraft@celanese.com)>; Audra Olson ([Audra.Olson@TRICORDconsulting.com](mailto:Audra.Olson@TRICORDconsulting.com)) <[Audra.Olson@tricordconsulting.com](mailto:Audra.Olson@tricordconsulting.com)>; Tammy Hartmann <[tammy.hartmann@tricordconsulting.com](mailto:tammy.hartmann@tricordconsulting.com)>  
**Subject:** Re: Working Draft Permit -- FOP O1628/Project 38302, Celanese Ltd./Bay City Plant

Hi Emily,

Thank you for reviewing our response and for the clarification requests. Please see our updates below:

- **OP-UA4:** Attached is the updated form with Tables 1a and 1b completed and the "product transferred" updated to VOC2. We have also included additional loading scenarios to document negative applicability for sources loading low vapor pressure materials.
- **OP-UA7:** The reference to 63EEEE was intentional. It demonstrates that while the site is not subject to MACT CC (as it is not a refinery), it is required to follow MACT CC standards to maintain compliance with MACT EEEE.

**Loading/Unloading Operations Attributes  
Form OP-UA4  
Federal Operating Permit Program  
Texas Commission on Environmental Quality**

**General Information**

Requested Information	Response
Date:	12/17/2025
Customer Reference No.:	600130850
Regulated Entity No.:	100258060
Permit No.:	O1628
Permit Area Name:	Celanese Bay City Plant
Permit Type:	SOP
Project Type:	Revision
Submission Type:	Existing Application Update
Project Number (if available):	38302
Form Information	TCEQ Entry Only
Title V Form Release Date:	02/2025
Form Number:	10041
APD ID Number:	38v1.0
Version Revised Date:	07/2025
	This form is for use by facilities subject to air quality permit requirements and may be revised periodically.

## Form OP-SUM - Individual Unit Summary

Table 1

Unit AI	Revision No.	Unit ID No.	Group ID No.	Unit Name/Description	CAM	PCA AI	Preconstruction Authorization (PCA) Category	Authorization/Registration Number	Permit By Rule (PBR) Number	PBR Effective Date
	6	25IDTL		Large Tank Truck Loading			NSR Permit	4449		
	6	25IDTL		Large Tank Truck Loading			PBR		106.473	09/04/2000
A	7	25IDTL2		Small Tank Truck Loading		A	NSR Permit	4449		
A	7	25IDTL2		Small Tank Truck Loading		A	PBR		106.473	09/04/2000
A	7	25IDTL2		Small Tank Truck Loading		A	PBR	142397	106.261	11/01/2003
A	7	25IDTL2		Small Tank Truck Loading		A	PBR	142397	106.262	11/01/2003
	5	25IDTC		Railcar Loading			NSR Permit	4449		
	5	25IDTC		Railcar Loading			PBR		106.473	09/04/2000

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**Table 1a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)****Subchapter C: Loading and Unloading of Volatile Organic Compounds**

Unit ID No.	SOP/GOP Index No.	Chapter 115 Facility Type	Alternate Control Requirement (ACR)	ACR ID No.	Product Transferred	Transfer Type	True Vapor Pressure	Daily Through-put	Control Options
25IDTL	R5211-CVS	OTHER	NONE		VOC2	BOTH	1.5+	NCE2	CON
251DTL2	R5211-CVS	OTHER	NONE		VOC2	BOTH	1.5+	NCE2	CON
25IDTL	R5211-E	OTHER	NONE		VOC2	BOTH	1.5-		
251DTL2	R5211-E	OTHER	NONE		VOC2	BOTH	1.5-		

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**Table 7a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)****Subpart G: National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Transfer Operations**

Unit ID No.	SOP Index No.	Transfer Rack Type	Subject to Subpart BB	Compliance Options	Closed Vent System	Hard Piping
25IDTL	63G-G1TR	GRP1			SUBPTH	
251DTC	63G-G1TR	GRP1			SUBPTH	▼

[Go to the Table of Contents](#)

**Table 7c: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)****Subpart G: National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Transfer Operations**

<b>Unit ID No.</b>	<b>SOP Index No.</b>	<b>Vapor Balancing System</b>	<b>Emissions Routing</b>	<b>Bypass Lines</b>	<b>Flow Indicator</b>
25IDTL	63G-G1TR	NO	NO	NO	
251DTC	63G-G1TR	NO	NO	NO	

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**Table 7d: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)****Subpart G: National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Transfer Operations**

Unit ID No.	SOP Index No.	Halogenated Emissions	Combustion Device	Emission Rate	Installation Date	Scrubber	Scrubber ID No.
25IDL	63G-G1TR	NO					
251DTC	63G-G1TR	NO					

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**Table 11b: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)****Subpart EEEE: National Emission Standards for Hazardous Air Pollutants: Organic Liquid Distribution (Non-Gasoline)**

Unit ID No.	SOP Index No.	Bypass Line	ALT 63SS MON Parameters	Prior Eval	Assessment Waiver	Formaldehyde	Negative Pressure
251DTL2	63EEEE-1	NONE					
251DTC	63EEEE-1	NONE					

[Go to the Table of Contents](#)

- **OP-UA12:** Please accept our apologies for the confusion. Our previous response should have specified MACT H rather than MACT G. Table 9 of the UA12 was included in our last submission for your reference.

Please let us know if you have any further questions!

**Nelwyn Mohrmann**  
**TRICORD**

402A West Palm Valley Blvd., PMB348  
Round Rock, TX 78664  
Office and Fax: 888.900.0746 x 725  
Cell (preferred): 512.968.7158  
E-mail: [Nelwyn.Mohrmann@TRICORDConsulting.com](mailto:Nelwyn.Mohrmann@TRICORDConsulting.com)  
Web: [www.TRICORDConsulting.com](http://www.TRICORDConsulting.com)

On Wed, Dec 17, 2025 at 8:47 AM Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)> wrote:

Good morning all,

I have almost finished resolving and preparing a response to your comments sent on 12/10, but I wanted to clarify a few items beforehand.

Please resolve by **12/22/2025**.

1. **Form OP-UA4:** In the OP-UA4 you sent me on 12/10, (Table 1a: 30 TAC Chapter 115, Subchapter C: Loading & Unloading of VOCs), "VOC3" was selected as the Product Transferred code. I suspect that this needs to be revisited, as the site is located in Matagorda County, which has its own set of codes and will use "VOC2." Additionally, this will change how the table will be filled out since the instructions will say to not continue if "Product Transferred" is "LPG1," "LPCC2," or "VOC3." Since the code is being revised, this will then mean to continue through the rest of Table 1a until instructions indicate not to continue. Please revise the UA4 for both Unit IDs 251DTL and 251DTL2 (Indexes R5211-CVS).

**Table 1a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)  
Subchapter C: Loading and Unloading of Volatile Organic Compounds**

Unit ID No.	SOP/GOP Index No.	Chapter 115 Facility Type	Alternate Control Requirement (ACR)	ACR ID No.	Product Transferred	Transfer Type	True Vapor Pressure	Daily Through-put	Control Options
251DTL	R5211-CVS	OTHER	NONE		VOC3	BOTH			
251DTL2	R5211-CVS	OTHER	NONE		VOC3	BOTH			

[Go to the Table of Contents](#)

**OP-UA4 Instructions**

**Product Transferred:**

Select one of the following options for each type of product loaded and/or unloaded. Enter the code on the form.

For facilities located in Bexar, Brazoria, Chambers, Collin, Dallas, Denton, Ellis, El Paso, Fort Bend, Galveston, Hardin, Harris, Jefferson, Johnson, Kaufman, Liberty, Montgomery, Orange, Parker, Rockwall, Tarrant, Wise, or Waller County:

Code	Description
LPG1	Liquefied petroleum gas (LPG)
GAS1	Gasoline
VOC1	Volatile organic compounds (VOC) other than LPG and gasoline

For facilities located in Aransas, Calhoun, Gregg, **Matagorda**, Nueces, San Patricio, Travis, or Victoria County:

Code	Description
LPCC2	Liquefied petroleum gas (LPG), crude oil, or condensate
GAS2	Gasoline
VOC2	Volatile organic compounds (VOC) other than LPG, crude oil, condensate, and gasoline

For facilities located in a covered attainment county other than Aransas, Calhoun, Gregg, Matagorda, Nueces, San Patricio, Travis, or Victoria:

Code	Description
GAS3	Gasoline
VOC3	Volatile organic compounds (VOC) other than gasoline

**Transfer Type:**

Select one of the following options for each type of transfer operation. Enter the code on the form.

Code	Description
UNLOAD	Only unloading
LOAD	Only loading
BOTH	Loading and unloading (do not use this code for marine terminals or marine sources that are both loading and unloading. Instead, use separate index numbers for the loading and unloading scenarios of the marine terminal or marine source)

- 2.) **Form OP-UA7:** As I prepared a response to your bullet point, "Celanese would like to retain NSPS A and MACT A applicability for the shipping flare. Additionally, PBR 106.476 needs to be added as an NSR authorization. An updated OP-UA7 is attached in support of these requests", I noticed that the index numbers chosen for the 40 CFR Part 63, Subpart CC (Table 6) were "63EEEE-MAX" and "63EEEE-NORM" and are index numbers that would normally refer to MACT EEEE operating scenarios. Did you mean to use these index numbers?

**Table 6: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)**

**Subpart CC: National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries**

Unit ID No.	SOP Index No.	Flare Applicability	Operating Limits	AMEL ID No.	Pressure Assisted	Flare Tip Velocity	Perimeter Assist Air
251DM1205	63EEEE-MAX	OTHER	REGOP		NO	60-400	NONE
251DM1205	63EEEE-NORM	OTHER	REGOP		NO	60-	NONE

[Go to the Table of Contents](#)

3.) In your final bullet point, “Celanese would like to combine the fugitive IDs of 251AF and 251F into one source ID (Shipping Area Fugitives) with NSPS VV, MACT G, and MACT EEEE applicability. An updated *OP-UA12* workbook is attached in support of this request”, you mentioned MACT G but the UA12 does not have a table in the UA12 for MACT G, so I wanted to double check to see if this was intentional.

Let me know if you have any questions. Thank you!

Best Regards,

Emily L. Knodell  
 Permit Reviewer  
 TCEQ – APD – OP Section (Title V)  
 (512) 239-3107

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---

**From:** Emily Knodell  
**Sent:** Wednesday, December 10, 2025 1:23 PM  
**To:** Ashcraft, Jennifer, Celanese <[jennifer.ashcraft@celanese.com](mailto:jennifer.ashcraft@celanese.com)>  
**Cc:** Audra Olson (<[Audra.Olson@TRICORDconsulting.com](mailto:Audra.Olson@TRICORDconsulting.com)> <[Audra.Olson@TRICORDconsulting.com](mailto:Audra.Olson@TRICORDconsulting.com)>); Nelwyn Mohrmann (<[nelwyn.mohrmann@tricordconsulting.com](mailto:nelwyn.mohrmann@tricordconsulting.com)>)  
**Subject:** RE: Working Draft Permit -- FOP O1628/Project 38302, Celanese Ltd./Bay City Plant

Good afternoon Jennifer,

Thank you for your comments on the draft. I will begin looking into them shortly.

Emily L. Knodell  
 Permit Reviewer  
 TCEQ – APD – OP Section (Title V)  
 (512) 239-3107

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**From:** Ashcraft, Jennifer, Celanese <[jennifer.ashcraft@celanese.com](mailto:jennifer.ashcraft@celanese.com)>  
**Sent:** Wednesday, December 10, 2025 1:04 PM  
**To:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
**Cc:** Audra Olson (<[Audra.Olson@TRICORDconsulting.com](mailto:Audra.Olson@TRICORDconsulting.com)> <[Audra.Olson@TRICORDconsulting.com](mailto:Audra.Olson@TRICORDconsulting.com)>); Nelwyn Mohrmann (<[nelwyn.mohrmann@tricordconsulting.com](mailto:nelwyn.mohrmann@tricordconsulting.com)>)  
**Subject:** RE: Working Draft Permit -- FOP O1628/Project 38302, Celanese Ltd./Bay City Plant

Good afternoon, Emily,

We've completed our review of the WDP, thank you for incorporating our earlier comments. Please see below for our comments and requested changes:

- 251DTC and 251DTL have duplicate Unit IDs (applicable requirements tables, NSR by EU Table). Please remove. Additionally, these are LOADING/UNLOADING OPERATIONS and should not be listed as FUGITIVE EMISSION UNITS on the Unit Summary Table.
- 251DTC and 251DTL still have high level MACT EEEE requirements in the permit. Please remove.
- Upon review, Celanese does need to create a second truck loading shipping ID: 251DTL2. An updated *OP-UA4* is attached in support of this request.
- 251DTC and future 251DTL2 - There should only be one operating scenario / SOP Index No. associated with 251DTC and 251DTL for MACT EEEE – 63EEEE-1. Please remove the second operating scenario as it has no applicable requirements, it was just documenting a negative applicability scenario.
- 251DTL - Celanese requested the removal of HON Group 2 applicability and the addition of HON Group 1 applicability (OP-UA4 provided in initial application and is in the attached updated *OP-UA4*)
- 251DTC (SOP Index R5211-CVS) – citations 115.216(3)(A)(i) and (iii) were added under recordkeeping. These were manually removed during the renewal, as they do not apply to railcars. Please remove 115.216(3)(A)(i) and (iii) from recordkeeping requirements.
- 251DTC (SOP Index 63G-G1TR) – citation 63.152(g)(1) was added under monitoring, recordkeeping, and reporting. These were manually removed during the renewal, as they do not apply to the facility since they are not utilizing the alternative provisions. Please remove.
- GRP-OLDST5K – Please update the SOP Index No. to 63EEEE-2 for MACT EEEE.
- 251DM1205 - Celanese would like to retain NSPS A and MACT A applicability for the shipping flare. Additionally, PBR 106.476 needs to be added as an NSR authorization. An updated *OP-UA7* is attached in support of these requests.
- TOTES - does not have any applicable requirement and therefore should not be listed in the permit. It should only be listed in the OP-PBRSUP form. We've updated the attached *OP-2* to reduce the confusion.

**Texas Commission on Environmental Quality**  
**Federal Operating Permit Program**  
**Application for Permit Revision/Renewal**  
**Form OP-2**  
**Table 2**

<b>Date:</b>	12/30/2024 (updated 12/10/2025)
<b>Permit No.:</b>	O1628
<b>Regulated Entity No.:</b>	100258060
<b>Company / Area Name:</b>	Celanese Ltd. / Bay City Plant

Using the table below, provide a description of the revision(s).

Revision No.	Revision Code	Unit/Group/Process			NSR Authorization	Description of Changes and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form(s)		
1	MS-C	Yes	V7033A	OP-SUMR OP-REQ3 OP-UA3	4449	Add new Unit ID to the permit with 40 CFR 63 Subpart EEEE applicability Add Unit ID to new Group ID per OP-SUMR Table 2
2	MS-C	Yes	V7033B	OP-SUMR OP-REQ3 OP-UA3	4449	Add new Unit ID to the permit with 40 CFR 63 Subpart EEEE applicability Add Unit ID to new Group ID per OP-SUMR Table 2
3	MS-C	Yes	251V1306	OP-SUMR OP-REQ3 OP-UA3	4449	Add new Unit ID to the permit with 40 CFR 63 Subpart EEEE applicability Add Unit ID to new Group ID per OP-SUMR Table 2
4	MS-C	Yes	GRP-OLDST5K	OP-SUMR OP-REQ3 OP-UA1	4449	Add storage tanks V7033A, V7033B, and 251V1306 to new Group ID per OP-SUMR Table 2
5	MS-C	No	251DTC	OP-REQ3 OP-UA4	4449 106.473/09/04/2000	Update unit description as shown on OP-SUM in OP-UA4 Update SOP Index Number from "63-RACK-FLR" to "63G-G1TR" for 40 CFR 63 Subpart G applicability Remove 'high level' applicability for 40 CFR 63, Subpart EEEE loading operations and fugitives per OP-REQ3 Table 2 Add citation-level applicability for 40 CFR 63, Subpart EEEE per OP-UA4 and OP-REQ3 Table 1

Texas Commission on Environmental Quality  
 Federal Operating Permit Program  
 Application for Permit Revision/Renewal  
 Form OP-2  
 Table 2

<b>Date:</b>	12/30/2024 (updated 12/10/2025)
<b>Permit No.:</b>	O1628
<b>Regulated Entity No.:</b>	100258060
<b>Company / Area Name:</b>	Celanese Ltd. / Bay City Plant

Using the table below, provide a description of the revision(s).

Revision No.	Revision Code	Unit/Group/Process			NSR Authorization	Description of Changes and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form(s)		
6	MS-C	No	251DTL	OP-REQ3 OP-UA4	4449 106.473/09/04/2000	Update unit description as shown on OP-SUM in the OP-UA4  Remove 'high level' applicability for 40 CFR 63, Subpart EEEE loading operations and fugitives per OP-REQ3 Table 2  Remove 40 CFR 63 Subpart G Group 2 Transfer Rack applicability per OP-REQ3 Table 2  Add citation-level applicability for 40 CFR 63, Subpart EEEE per OP-UA4 and OP-REQ3 Table 1  Add 40 CFR 63 Subpart G Group 1 Transfer Rack applicability per OP-UA4
7	MS-C	Yes	251DTL2	OP-REQ3 OP-UA4	4449 106.473/09/04/2000 106.261/11/01/2003 [142397] 106.262/11/01/2003 [142397]	Add new Unit ID to the permit with 30 TAC Chapter 115 Loading and 40 CFR 63 Subpart EEEE applicability
8	MS-C	No	251DM1205	OP-REQ3 OP-UA7	4449 106.476/09/04/2000 106.261/11/01/2003 [142397] 106.262/11/01/2003 [142397]	Remove 40 CFR 63 Subpart A applicability per OP-REQ3 Table 2  Add 40 CFR 63 Subpart CC applicability per OP-UA7  Add PBR 106.476 authorization to source.
9	MS-C	Yes	251AF 251F	OP-SUMR OP-REQ3 OP-UA12 OP-PBRSUP	4449 106.261/11/01/2003 [163480] 106.262/11/01/2003 [163480] 106.262/11/01/2003 [176028]	Rename Source ID to 251F. Add 40 CFR 63 Subpart EEEE applicability.  Add registered PBR to OP-PBRSUP

Texas Commission on Environmental Quality  
 Federal Operating Permit Program  
 Application for Permit Revision/Renewal  
 Form OP-2  
 Table 2

<b>Date:</b>	12/30/2024 (updated 12/10/2025)
<b>Permit No.:</b>	O1628
<b>Regulated Entity No.:</b>	100258060
<b>Company / Area Name:</b>	Celanese Ltd. / Bay City Plant

Using the table below, provide a description of the revision(s).

Revision No.	Revision Code	Unit/Group/Process			NSR Authorization	Description of Changes and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form(s)		
10	MS-C	No	251DBL	OP-SUMR	4449 106.264/09/04/2000 [176303]	Add registered 106.264 PBR as a NSR Authorization and to OP-PBRSUP
11	MS-C	No	Various	OP-PBRSUP	Various	Update OP-PBRSUP form, as provided.

Texas Commission on Environmental Quality  
 Federal Operating Permit Program  
 Individual Unit Summary for Revisions  
 Form OP-SUMR  
 Table 1

Date		Permit No.		Regulated Entity No.			
12/30/2024 (updated 12/10/2025)		O1628		100258060			
Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
A	1	V7033A	OP-REQ3 <del>OP-UA1</del> OP-UA3	Storage Tank		4449	
A	2	V7033B	OP-REQ3 <del>OP-UA1</del> OP-UA3	Storage Tank		4449	
A	3	251V1306	OP-REQ3 <del>OP-UA1</del> OP-UA3	Storage Tank		4449	
	5	251DTC	OP-REQ3 <del>OP-UA1</del> OP-UA4	<del>Railcar Loading Area General</del> Railcar Loading		4449 106.473/09/04/2000	
	6	251DTL	OP-REQ3 <del>OP-UA1</del> OP-UA4	Large Tank Truck Loading <del>Rack General</del>		4449 106.473/09/04/2000	
A	7	251DTL2	OP-REQ3 OP-UA4	Small Tank Truck Loading		4449 106.473/09/04/2000 106.261/11/01/2003 [142397] 106.262/11/01/2003 [142397]	
	9	<del>251AF</del> 251F	OP-REQ3 OP-UA12	Shipping Equipment Fugitives		4449 <b>106.261/11/01/2003 [163480]</b> <b>106.262/11/01/2003 [163480]</b> <b>106.262/11/01/2003 [176028]</b>	
	10	251DBL	OP-SUMR	Barge Loading Area General		4449 <b>106.264/09/04/2000 [176303]</b>	

Texas Commission on Environmental Quality  
 Federal Operating Permit Program  
 Individual Unit Summary for Revisions  
 Form OP-SUMR  
 Table 2

Date	Permit No.	Regulated Entity No.
12/30/2024 (updated 9/26/2025)	O1628	100258060

Revision No.	ID No.	Applicable Form	Group AI	Group ID No.
1	V7033A	<del>OP-UA1</del> OP-UA3	A	GRP-OLDST5K
2	V7033B	<del>OP-UA1</del> OP-UA3	A	GRP-OLDST5K
3	251V1306	<del>OP-UA1</del> OP-UA3	A	GRP-OLDST5K

**Flare Attributes  
Form OP-UA7  
Federal Operating Permit Program  
Texas Commission on Environmental Quality**

**General Information**

Requested Information	Response
Date:	12/10/2025
Customer Reference No.:	600130850
Regulated Entity No.:	100258060
Permit No.:	O1628
Permit Area Name:	Celanese Bay City Plant
Permit Type:	SOP
Project Type:	Revision
Submission Type:	Existing Application Update
Project Number (if available):	38302

Form Information	TCEQ Entry Only
Title V Form Release Date:	10/2025
Form Number:	10022
APD ID Number:	41v2.0
Version Revised Date:	10/2025
	This form is for use by facilities subject to air quality permit requirements and may be revised periodically.



**Table 1: Title 30 Texas Administrative Code Chapter 111 (30 TAC Chapter 111)****Control of Air Pollution from Visible Emissions and Particulate Matter**

Unit ID No.	SOP/GOP Index No.	Acid Gases Only	Emergency/Upset Conditions Only	Alternate Opacity Limitation (AOL)	AOL ID No.	Construction Date
251DM1205	R1111-FLARE	NO	NO		▼	

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**Table 4: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)****Subpart A: General Provisions of National Emission Standards for Hazardous Air Pollutants for Source Categories**

Unit ID No.	SOP/GOP Index No.	Required Under 40 CFR Part 63	Heat Content Specification	Flare Assist Type	Flare Exit Velocity	Heating Value of Gas
251DM1205	63A-AIR	YES	YES	AIR		

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**Loading/Unloading Operations Attributes**  
**Form OP-UA4**  
**Federal Operating Permit Program**  
**Texas Commission on Environmental Quality**

**General Information**

Requested Information	Response
<b>Date:</b>	12/10/2025
<b>Customer Reference No.:</b>	600130850
<b>Regulated Entity No.:</b>	100258060
<b>Permit No.:</b>	O1628
<b>Permit Area Name:</b>	Celanese Bay City Plant
<b>Permit Type:</b>	SOP
<b>Project Type:</b>	Revision
<b>Submission Type:</b>	Existing Application Update
<b>Project Number (if available):</b>	38302
Form Information	TCEQ Entry Only
<b>Title V Form Release Date:</b>	02/2025
<b>Form Number:</b>	10041
<b>APD ID Number:</b>	38v1.0
<b>Version Revised Date:</b>	07/2025
	This form is for use by facilities subject to air quality permit requirements and may be revised periodically.

## Form OP-SUM - Individual Unit Summary

Table 1

Unit AI	Revision No.	Unit ID No.	Group ID No.	Unit Name/Description	CAM	PCA AI	Preconstruction Authorization (PCA) Category	Authorization/Registration Number	Permit By Rule (PBR) Number	PBR Effective Date
	6	25IDTL		Large Tank Truck Loading			NSR Permit	4449		
	6	25IDTL		Large Tank Truck Loading			PBR		106.473	09/04/2000
A	7	25IDTL2		Small Tank Truck Loading		A	NSR Permit	4449		
A	7	25IDTL2		Small Tank Truck Loading		A	PBR		106.473	09/04/2000
A	7	25IDTL2		Small Tank Truck Loading		A	PBR	142397	106.261	11/01/2003
A	7	25IDTL2		Small Tank Truck Loading		A	PBR	142397	106.262	11/01/2003
	5	25IDTC		Railcar Loading			NSR Permit	4449		
	5	25IDTC		Railcar Loading			PBR		106.473	09/04/2000

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**Table 7c: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)****Subpart G: National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Transfer Operations**

<b>Unit ID No.</b>	<b>SOP Index No.</b>	<b>Vapor Balancing System</b>	<b>Emissions Routing</b>	<b>Bypass Lines</b>	<b>Flow Indicator</b>
25IDTL	63G-G1TR	NO	NO	NO	
251DTC	63G-G1TR	NO	NO	NO	

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**Table 7d: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)****Subpart G: National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Transfer Operations**

Unit ID No.	SOP Index No.	Halogenated Emissions	Combustion Device	Emission Rate	Installation Date	Scrubber	Scrubber ID No.
251DTL	63G-G1TR	NO					
251DTC	63G-G1TR	NO					

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**Table 11a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)****Subpart EEEE: National Emission Standards for Hazardous Air Pollutants: Organic Liquid Distribution (Non-Gasoline)**

Unit ID No.	SOP Index No.	Means of Compliance	Emissions Type	Combination of Control Devices	Control Device	Control Device ID No.	Meets 63.988(b)(2)	Performance Test	Continuous Monitoring System
251DTL2	63EEEE-1	98PR	LOW3	NO	FLARE	251DM1205			
251DTL2	63EEEE-2	T2-							
251DTC	63EEEE-1	98PR	LOW3	NO	FLARE	251DM1205			
251DTC	63EEEE-2	T2-							

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**Table 11b: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)****Subpart EEEE: National Emission Standards for Hazardous Air Pollutants: Organic Liquid Distribution (Non-Gasoline)**

Unit ID No.	SOP Index No.	Bypass Line	ALT 63SS MON Parameters	Prior Eval	Assessment Waiver	Formaldehyde	Negative Pressure
251DTL2	63EEEE-1	NONE					
251DTC	63EEEE-1	NONE					

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**Fugitive Emission Unit Attributes  
Form OP-UA12  
Federal Operating Permit Program  
Texas Commission on Environmental Quality**

**General Information**

Requested Information	Response
<b>Date:</b>	12/10/2025
<b>Customer Reference No.:</b>	600130850
<b>Regulated Entity No.:</b>	100258060
<b>Permit No.:</b>	O1628
<b>Permit Area Name:</b>	Celanese Bay City Plant
<b>Permit Type:</b>	SOP
<b>Project Type:</b>	Revision
<b>Submission Type:</b>	Existing Application Update
<b>Project Number (if available):</b>	38302
Form Information	TCEQ Entry Only
<b>Title V Form Release Date:</b>	10/2025
<b>Form Number:</b>	10045
<b>APD ID Number:</b>	12v2.0
<b>Version Revised Date:</b>	10/2025
	This form is for use by facilities subject to air quality permit requirements and may be revised periodically.





**Table 4b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)****Subpart VV: Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for which Construction, Reconstruction, or Modification Commenced After January 5, 1981, and on or Before November 7, 2006**

Unit ID No.	SOP Index No.	Any Component: Equipment in VOC Service	Any Component: Vacuum Service	Any Component: VOC Service < 300 hrs/yr	Pumps: Light Liquid Service	Pumps: EEL	Pumps: EEL ID No.	Pumps: Complying with §60.482-2
251F	60VV-ALL	YES	NO	NO				

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**Table 4j: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)****Subpart VV: Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for which Construction, Reconstruction, or Modification Commenced After January 5, 1981, and on or Before November 7, 2006**

Unit ID No.	SOP Index No.	Closed Vent System and Control Device: Flare	Closed Vent System and Control Device: EEL	Closed Vent System and Control Device: EEL ID No.	Closed Vent System and Control Device: Complying with §60.482-10	Closed Vent System and Control Device: Control Device ID.
251F	60VV-ALL	YES	NO		YES	251DM1205

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**Table 9f: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)****Subpart H: National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks**

<b>Unit ID No.</b>	<b>SOP Index No.</b>	<b>Closed-Vent System: Any</b>	<b>Closed-Vent System: Recovery or Recapture Devices</b>	<b>Recovery or Recapture Device Control Device ID No.</b>	<b>Closed-Vent System: Enclosed Combustion Devices</b>	<b>Enclosed Combustion Device ID No.</b>	<b>Closed-Vent System: Flares</b>	<b>Flare Control Device ID No.</b>
251F	63H-ALL	YES					YES	251DM1205

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**Table 23a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)****Subpart EEEE: National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline)**

Unit ID No.	SOP Index No.	Means of Compliance	General AMEL ID No.	TT Units Without an AMEL	Heavy Liquid Service	H Units Without an AMEL
251F	63EEEEH-ALL					

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- Celanese would like to combine the fugitive IDs of 251AF and 251F into one source ID (Shipping Area Fugitives) with NSPS VV, MACT G, and MACT EEEE applicability. An updated OP-UA12 workbook is attached in support of this request.

Please let me know if you have any questions or need additional information.

Thank you,

*Jennifer Ashcraft*

Environmental / Quality / Lab Manager



2001 FM 3057

Bay City, TX 77414-2968

Office: 979.216.0375

[Jennifer.ashcraft@celanese.com](mailto:Jennifer.ashcraft@celanese.com)

General Business Information

**From:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>

**Sent:** Monday, November 10, 2025 3:28 PM

**To:** Ashcraft, Jennifer, Celanese <[jennifer.ashcraft@celanese.com](mailto:jennifer.ashcraft@celanese.com)>

**Cc:** Audra Olson ([Audra.Olson@TRICORDconsulting.com](mailto:Audra.Olson@TRICORDconsulting.com)) <[Audra.Olson@TRICORDconsulting.com](mailto:Audra.Olson@TRICORDconsulting.com)>

**Subject:** [EXT]Working Draft Permit -- FOP O1628/Project 38302, Celanese Ltd./Bay City Plant

**CAUTION: This email originated from outside Celanese. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Good afternoon all,

I have conducted a technical review of *revision* application for **Celanese Ltd./Bay City Plant**. An electronic copy of the Working Draft Permit (WDP) is attached for your review. This WDP contains the TCEQ determination of applicable requirements based on the information submitted in your application, and any updates provided. You may notice that some text is colored **green** within the draft. I do this to help myself keep track of the changes being made. The green text will be removed when I prepare the project for management review.

Summary of Changes:

1. Added new Unit IDs V7033A, V7033B, and 251V1306 to new Group ID GRP-OLDST5K with 40 CFR Part 63, Subpart EEEE applicability (Draft Pages 16, 50, 68).
2. Unit ID 251DTC:
  - Updated unit description from "Railcar Loading Area General" to "Railcar Loading" (Draft Page 68).
  - Updated SOP Index Number from "63-RACK-FLR" to "63G-G1TR" (Draft Page 36).
  - Added new operating scenario, Index No. 63EEEE-2 (Draft Page 15, 34-35).
3. Unit ID 251DTL:
  - Updated unit description from "truck loading rack general" to "truck loading" (Draft Page 68).
  - Added new unit specific PCA, PBR 106.473/09/04/2000 (Draft Page 68).
  - Added new operating scenario, Index No. 63EEEE-2 (Draft 15, 37-39).
4. Unit ID 251DM1205:
  - Removed 40 CFR Part 63, Subpart A applicability by deleting Index Number "60A-AIR".
  - Added 40 CFR Part 63, Subpart CC applicability by adding two new operating scenarios, 63EEEE-MAX and 63EEEE-NORM (Draft Pages 14, 33).
  - Added new unit specific PCA, PBR 106.476/09/04/2000 (Draft Page 68).
5. Unit ID 251F
  - Added new unit with 40 CFR Part 63, Subpart EEEE and 40 CFR Part 63, Subpart H applicability (Draft Pages 15, 39-50).
  - Added new unit specific PCAs, PBRs 106.261/11/01/2003[163480], 106.262/11/01/2003 [163480], 106.262/11/01/2003 [176028] (Draft Page 68).
6. Unit ID 251DBL:
  - Added new unit specific PCA, PBR 106.264/09/04/2000 [176303] (Draft Page 67).
7. Unit ID TOTES:
  - Added two new unit specific PCAS, 106.261/11/01/2003 [176760] and 106.262/11/01/2003 [176760] (Draft Page 68).

Please review the WDP and submit to me any comments you have on the working draft permit by **December 10, 2025**.

Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP.

Please review the second portion of the "SOP Technical Review Fact Sheet" located

at [http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\\_V/sop\\_wdp\\_factsheet.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_factsheet.pdf). This guidance contains important information regarding WDP review and comment procedures.

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified application information, including application updates supporting the WDP comments, is required. After final review of the WDP, additional changes supported by application updates may require certification. I will advise you of these changes at a later date. Prior to transmittal of the Public Notice/Announcement Authorization Package, a duly signed OP-CRO1 form may be required which includes the specific dates or time-period of all submitted application documentation that was not previously certified. I will advise you of this requirement prior to sending the Public Notice/Announcement Authorization.

Application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO/DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. Application updates that are provided through email or physical mail require certification using an original signature OP-CRO1.

Please notify me when these updates have been submitted.

**As required on Form OP-1, question IV.D, please remember the FOP application and all application updates must be submitted to EPA Region 6 at [R6AirPermitsTX@epa.gov](mailto:R6AirPermitsTX@epa.gov) and to the TCEQ regional office having jurisdiction. This submittal information can be found on our website at [Where to Submit FOP Applications and Permit-Related Documents](#).**

Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,

Emily L. Knodell  
Permit Reviewer  
TCEQ – APD – OP Section (Title V)  
(512) 239-3107



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**From:** Emily Knodell  
**Sent:** Wednesday, October 1, 2025 11:30 AM  
**To:** Ashcraft, Jennifer, Celanese <[jennifer.ashcraft@celanese.com](mailto:jennifer.ashcraft@celanese.com)>  
**Cc:** Audra Olson ([Audra.Olson@TRICORDconsulting.com](mailto:Audra.Olson@TRICORDconsulting.com)) <[Audra.Olson@TRICORDconsulting.com](mailto:Audra.Olson@TRICORDconsulting.com)>  
**Subject:** RE: Re: FW: Technical Review -- FOP O1628/Project 38302, Celanese Ltd./Bay City Plant

Good morning Jennifer,

I have received the updates, thank you for sending and I hope you are feeling better.

Best Regards,

Emily L. Knodell  
Permit Reviewer  
TCEQ – APD – OP Section (Title V)  
(512) 239-3107



How are we doing? Fill out our online customer satisfaction survey at [www.tceq.texas.gov/customersurvey](http://www.tceq.texas.gov/customersurvey)

---

**From:** Ashcraft, Jennifer, Celanese <[jennifer.ashcraft@celanese.com](mailto:jennifer.ashcraft@celanese.com)>  
**Sent:** Tuesday, September 30, 2025 1:31 PM  
**To:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
**Cc:** Audra Olson ([Audra.Olson@TRICORDconsulting.com](mailto:Audra.Olson@TRICORDconsulting.com)) <[Audra.Olson@TRICORDconsulting.com](mailto:Audra.Olson@TRICORDconsulting.com)>  
**Subject:** FW: Re: FW: Technical Review -- FOP O1628/Project 38302, Celanese Ltd./Bay City Plant

Emily, my apologies for the late submittal. I was out sick Friday and Monday and was unable to forward the email from our technical consultants.

Please see the below response, and respective attachments.

Let me know if you have any questions or need additional information.

Sincerely,

*Jennifer Ashcraft*  
Environmental / Quality / Lab Manager



2001 FM 3057  
Bay City, TX 77414-2968  
Office: 979.216.0375  
[Jennifer.ashcraft@celanese.com](mailto:Jennifer.ashcraft@celanese.com)

General Business Information

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**From:** Nelwyn Mohrmann <[nelwyn.mohrmann@tricordconsulting.com](mailto:nelwyn.mohrmann@tricordconsulting.com)>  
**Sent:** Friday, September 26, 2025 5:34 PM

**Texas Commission on Environmental Quality**  
**Federal Operating Permit Program**  
**Application for Permit Revision/Renewal**  
**Form OP-2**  
**Table 2**

<b>Date:</b>	12/30/2024 (updated 9/26/2025)
<b>Permit No.:</b>	O1628
<b>Regulated Entity No.:</b>	100258060
<b>Company / Area Name:</b>	Celanese Ltd. / Bay City Plant

Using the table below, provide a description of the revision(s).

Revision No.	Revision Code	Unit/Group/Process			NSR Authorization	Description of Changes and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form(s)		
1	MS-C	Yes	V7033A	OP-SUMR OP-REQ3 <del>OP-UA1</del> OP-UA3	4449	Add new Unit ID to the permit with 40 CFR 63 Subpart EEEE applicability <a href="#">Add Unit ID to new Group ID per OP-SUMR Table 2</a>
2	MS-C	Yes	V7033B	OP-SUMR OP-REQ3 <del>OP-UA1</del> OP-UA3	4449	Add new Unit ID to the permit with 40 CFR 63 Subpart EEEE applicability <a href="#">Add Unit ID to new Group ID per OP-SUMR Table 2</a>
3	MS-C	Yes	251V1306	OP-SUMR OP-REQ3 <del>OP-UA1</del> OP-UA3	4449	Add new Unit ID to the permit with 40 CFR 63 Subpart EEEE applicability <a href="#">Add Unit ID to new Group ID per OP-SUMR Table 2</a>
4	MS-C	Yes	GRP-OLDST5K	OP-SUMR OP-REQ3 <del>OP-UA1</del>	4449	Add storage tanks V7033A, V7033B, and 251V1306 to new Group ID per OP-SUMR Table 2
5	MS-C	No	251DTC	OP-SUMR OP-REQ3 <del>OP-UA1</del> OP-UA4	4449 106.473/09/04/2000	Update unit description as shown on OP-SUMR Update SOP Index Number from "63-RACK-FLR" to "63G-G1TR" for 40 CFR 63 Subpart G applicability Remove 'high level' applicability for 40 CFR 63, Subpart EEEE loading operations and fugitives per OP-REQ3 Table 2 Add citation-level applicability for 40 CFR 63, Subpart EEEE per OP-UA1 and OP-REQ3 Table 1

**Texas Commission on Environmental Quality**  
**Federal Operating Permit Program**  
**Application for Permit Revision/Renewal**  
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**Table 2**

<b>Date:</b>	12/30/2024 (updated 9/26/2025)
<b>Permit No.:</b>	O1628
<b>Regulated Entity No.:</b>	100258060
<b>Company / Area Name:</b>	Celanese Ltd. / Bay City Plant

Using the table below, provide a description of the revision(s).

Revision No.	Revision Code	Unit/Group/Process			NSR Authorization	Description of Changes and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form(s)		
6	MS-C	No	251DTL	OP-SUMR OP-REQ3 <del>OP-UA1</del> OP-UA4	4449 106.473/09/04/2000	Update unit description as shown on OP-SUMR  Remove 'high level' applicability for 40 CFR 63, Subpart EEEE loading operations and fugitives per OP-REQ3 Table 2  Remove 40 CFR 63 Subpart G Group 2 Transfer Rack applicability per OP-REQ3 Table 2  Add citation-level applicability for 40 CFR 63, Subpart EEEE per OP-UA1 and OP-REQ3 Table 1  Add 40 CFR 63 Subpart G Group 1 Transfer Rack applicability per OP-UA4
7	MS-C	Yes	251DTL2	OP-SUMR OP-REQ3 OP-UA1 OP-UA4	4449 106.473/09/04/2000 <del>106.261/11/01/2003 [142397]</del> <del>106.262/11/01/2003 [142397]</del>	Add new Unit ID to the permit with 30 TAC Chapter 115 Loading and 40 CFR 63 Subpart EEEE applicability
8	MS-C	No	251DM1205	OP-REQ3 OP-UA7	4449 106.476/09/04/2000 106.261/11/01/2003 [142397] 106.262/11/01/2003 [142397]	Remove 40 CFR 63 Subpart A applicability per OP-REQ3 Table 2  Add 40 CFR 63 Subpart CC applicability per OP-UA7
9	MS-C	Yes	251F	OP-SUMR OP-REQ3 OP-UA12 OP-PBRSUP	106.261/11/01/2003 [163480] 106.262/11/01/2003 [163480] 106.262/11/01/2003 [176028]	Add new Unit ID to the permit with 40 CFR 63 Subpart H and 40 CFR 63 Subpart EEEE applicability  Add registered PBR to OP-PBRSUP

Texas Commission on Environmental Quality  
 Federal Operating Permit Program  
 Application for Permit Revision/Renewal  
 Form OP-2  
 Table 2

<b>Date:</b>	12/30/2024 (updated 9/26/2025)
<b>Permit No.:</b>	O1628
<b>Regulated Entity No.:</b>	100258060
<b>Company / Area Name:</b>	Celanese Ltd. / Bay City Plant

Using the table below, provide a description of the revision(s).

Revision No.	Revision Code	Unit/Group/Process			NSR Authorization	Description of Changes and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form(s)		
10	MS-C	No	251DBL	OP-PBR SUP	106.264/09/04/2000 [176303]	Add registered PBR to OP-PBR SUP
11	MS-C	No	TOTES	OP-PBR SUP	106.261/11/01/2003 [176760] 106.262/11/01/2003 [176760]	Add registered PBR to OP-PBR SUP

**Applicable Requirements Summary  
Form OP-REQ3 (Page 1)  
Federal Operating Permit Program  
Table 1a: Additions**

Date:	<b>12/30/2024 (updated 9/26/2025)</b>	Regulated Entity No.:	<b>100258060</b>	Permit No.:	<b>O1628</b>
Company Name:	<b>Celanese Ltd.</b>	Area Name:	<b>Bay City Plant</b>		

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
1 2 3	GRP-OLDST5K	OP-UA3	63EEEE-3	112(B) HAPS	40 CFR Part 63, Subpart EEEE	§63.2343(a)
4	GRP-OLDST5K	OP-UA1	63EEEE-2	112(B) HAPS	40 CFR Part 63, Subpart EEEE	§63.2338 §63.2343(a)

**Applicable Requirements Summary  
Form OP-REQ3 (Page 1)  
Federal Operating Permit Program  
Table 1a: Additions**

Date: <b>12/30/2024 (updated 9/26/2025)</b>	Regulated Entity No.: <b>100258060</b>	Permit No.: <b>O1628</b>
Company Name: <b>Celanese Ltd.</b>	Area Name: <b>Bay City Plant</b>	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
5	251DTC	OP-UA4	63EEEE-1	112(B) HAPS	40 CFR Part 63, Subpart EEEE	§63.2338(b)(3) §63.2338(b)(3)(ii) §63.2342(b) §63.2342(b)(1) §63.2342(b)(3)(i) §63.2342(e) §63.2342(e)(3) §63.2342(e)(4) §63.2346(b) §63.2346(b)(1) §63.2346(k) [G]§63.2346(l) §63.2350(a) §63.2350(d) [G]§63.2378(e) [G]§63.2380 §63.982(a)(3)(i) §63.982(b) [G]§63.983 [G]§63.160 [G]§63.670 [G]§63.671

**Applicable Requirements Summary  
Form OP-REQ3 (Page 1)  
Federal Operating Permit Program  
Table 1a: Additions**

Date:	<b>12/30/2024 (updated 9/26/2025)</b>	Regulated Entity No.:	<b>100258060</b>	Permit No.:	<b>O1628</b>
Company Name:	<b>Celanese Ltd.</b>	Area Name:	<b>Bay City Plant</b>		

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
5	251DTC	OP-UA4	63EEEE-2	112(B) HAPS	40 CFR Part 63, Subpart EEEE	§63.2343(c)

**Applicable Requirements Summary  
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Federal Operating Permit Program  
Table 1a: Additions**

Date: <b>12/30/2024 (updated 9/26/2025)</b>	Regulated Entity No.: <b>100258060</b>	Permit No.: <b>O1628</b>
Company Name: <b>Celanese Ltd.</b>	Area Name: <b>Bay City Plant</b>	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
6	251DTL	OP-UA4	63EEEE-1	112(B) HAPS	40 CFR Part 63, Subpart EEEE	§63.2338(b)(3) §63.2338(b)(3)(ii) §63.2342(b) §63.2342(b)(1) §63.2342(b)(3)(i) §63.2342(e) §63.2342(e)(3) §63.2342(e)(4) §63.2346(b) §63.2346(b)(1) §63.2346(k) [G]§63.2346(l) §63.2350(a) §63.2350(d) [G]§63.2378(e) [G]§63.2380 §63.982(a)(3)(i) §63.982(b) [G]§63.983 [G]§63.160 [G]§63.670 [G]§63.671

**Applicable Requirements Summary  
Form OP-REQ3 (Page 1)  
Federal Operating Permit Program  
Table 1a: Additions**

Date:	<b>12/30/2024 (updated 9/26/2025)</b>	Regulated Entity No.:	<b>100258060</b>	Permit No.:	<b>O1628</b>
Company Name:	<b>Celanese Ltd.</b>	Area Name:	<b>Bay City Plant</b>		

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
6	251DTL	OP-UA4	63EEEE-2	112(B) HAPS	40 CFR Part 63, Subpart EEEE	§63.2343(c)

**Applicable Requirements Summary  
Form OP-REQ3 (Page 1)  
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Table 1a: Additions**

Date: <b>12/30/2024 (updated 9/26/2025)</b>	Regulated Entity No.: <b>100258060</b>	Permit No.: <b>O1628</b>
Company Name: <b>Celanese Ltd.</b>	Area Name: <b>Bay City Plant</b>	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
6	251DTL	OP-UA4	63G-G1TR	112(B) HAPS	40 CFR Part 63, Subpart G	§ 63.126(a) § 63.11 § 63.126(a)(1) § 63.126(a)(2) § 63.126(a)(3) [G]§ 63.126(b)(2) [G]§ 63.126(d)(3) § 63.126(f) § 63.126(g) § 63.126(h) § 63.172(a) [G]§ 63.172(h) § 63.172(i) § 63.172(m)

**Applicable Requirements Summary  
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Federal Operating Permit Program  
Table 1a: Additions**

Date: <b>12/30/2024 (updated 9/26/2025)</b>	Regulated Entity No.: <b>100258060</b>	Permit No.: <b>O1628</b>
Company Name: <b>Celanese Ltd.</b>	Area Name: <b>Bay City Plant</b>	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
7	251DTL2	OP-UA1	63EEEE-1	112(B) HAPS	40 CFR Part 63, Subpart-EEEE	§63.2338(b)(3) §63.2338(b)(3)(ii) §63.2342(b) §63.2342(b)(1) §63.2342(b)(3)(i) §63.2342(e) §63.2342(e)(3) §63.2342(e)(4) §63.2346(b) §63.2346(b)(1) §63.2346(k) [G]§63.2346(l) §63.2350(a) §63.2350(d) [G]§63.2378(e) [G]§63.2380 §63.982(a)(3)(i) §63.982(b) [G]§63.983 [G]§63.160 [G]§63.670 [G]§63.671

**Applicable Requirements Summary  
Form OP-REQ3 (Page 1)  
Federal Operating Permit Program  
Table 1a: Additions**

Date:	12/30/2024 (updated 9/26/2025)	Regulated Entity No.:	100258060	Permit No.:	01628
Company Name:	Celanese Ltd.	Area Name:	Bay City Plant		

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
7	251DTL2	OP-UA4	R5211-CVS	VOC	30 TAC Chapter 115, Loading and Unloading of VOC	§ 115.212(b)(1) § 115.212(b)(1)(A) § 115.212(b)(2) § 115.212(b)(3)(A) § 115.212(b)(3)(A)(ii) § 115.212(b)(3)(B) [G] § 115.212(b)(3)(C) § 115.212(b)(3)(D) § 115.212(b)(3)(E) § 115.214(b)(1)(B) § 115.214(b)(1)(C) § 60.18

**Applicable Requirements Summary  
Form OP-REQ3 (Page 1)  
Federal Operating Permit Program  
Table 1a: Additions**

Date:	<b>12/30/2024 (updated 9/26/2025)</b>	Regulated Entity No.:	<b>100258060</b>	Permit No.:	<b>O1628</b>
Company Name:	<b>Celanese Ltd.</b>	Area Name:	<b>Bay City Plant</b>		

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
8	251DM1205	OP-UA7	63EEEE-MAX	Opacity	40 CFR Part 63, Subpart CC	§63.670 §63.670(b) §63.670(c) §63.670(d) §63.670(d)(2) §63.670(e) §63.670(o) [G]§63.670(o)(1) [G]§63.670(o)(2) [G]§63.670(o)(3) [G]§63.670(o)(4) [G]§63.670(o)(5) §63.670(o)(6) [G]§63.670(o)(7) [G]§63.671(c)

**Applicable Requirements Summary  
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Table 1a: Additions**

Date:	<b>12/30/2024 (updated 9/26/2025)</b>	Regulated Entity No.:	<b>100258060</b>	Permit No.:	<b>O1628</b>
Company Name:	<b>Celanese Ltd.</b>	Area Name:	<b>Bay City Plant</b>		

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
8	251DM1205	OP-UA7	63EEEE-NORM	Opacity	40 CFR Part 63, Subpart CC	§63.670 §63.670(b) §63.670(c) §63.670(d) §63.670(d)(1) §63.670(e) §63.670(o) [G]§63.670(o)(1) [G]§63.670(o)(2) [G]§63.670(o)(3) [G]§63.670(o)(4) [G]§63.670(o)(5) §63.670(o)(6) [G]§63.670(o)(7) [G]§63.671(c)
9	251F	OP-UA12	63H-ALL	112(B) HAPS	40 CFR Part 63, Subpart H	§ 63.162(e) § 63.162(a) § 63.162(c) [G]§ 63.162(g) § 63.162(h)
9	251F	OP-UA12	63H-ALL	112(B) HAPS	40 CFR Part 63, Subpart H	[G]§ 63.164 § 63.162(a) § 63.162(c) [G]§ 63.162(f) [G]§ 63.162(g) § 63.162(h) [G]§ 63.171

**Applicable Requirements Summary  
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Table 1a: Additions**

Date: <b>12/30/2024 (updated 9/26/2025)</b>	Regulated Entity No.: <b>100258060</b>	Permit No.: <b>O1628</b>
Company Name: <b>Celanese Ltd.</b>	Area Name: <b>Bay City Plant</b>	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
9	251F	OP-UA12	63H-ALL	112(B) HAPS	40 CFR Part 63, Subpart H	[G]§ 63.168 § 63.162(a) § 63.162(c) [G]§ 63.162(f) [G]§ 63.162(g) § 63.162(h) [G]§ 63.171 [G]§ 63.175
9	251F	OP-UA12	63H-ALL	112(B) HAPS	40 CFR Part 63, Subpart H	[G]§ 63.167 § 63.162(a) § 63.162(c) [G]§ 63.162(g) § 63.162(h) [G]§ 63.171 [G]§ 63.175
9	251F	OP-UA12	63H-ALL	112(B) HAPS	40 CFR Part 63, Subpart H	[G]§ 63.163 § 63.162(a) § 63.162(c) [G]§ 63.162(f) [G]§ 63.162(g) § 63.162(h) [G]§ 63.171 [G]§ 63.176

**Applicable Requirements Summary  
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Table 1a: Additions**

Date:	<b>12/30/2024 (updated 9/26/2025)</b>	Regulated Entity No.:	<b>100258060</b>	Permit No.:	<b>O1628</b>
Company Name:	<b>Celanese Ltd.</b>	Area Name:	<b>Bay City Plant</b>		

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
9	251F	OP-UA12	63H-ALL	112(B) HAPS	40 CFR Part 63, Subpart H	[G]§ 63.174 § 63.162(a) § 63.162(c) [G]§ 63.162(f) [G]§ 63.162(g) § 63.162(h) [G]§ 63.171
9	251F	OP-UA12	63H-ALL	112(B) HAPS	40 CFR Part 63, Subpart H	[G]§ 63.173 § 63.162(a) § 63.162(c) [G]§ 63.162(f) [G]§ 63.162(g) § 63.162(h) [G]§ 63.171
9	251F	OP-UA12	63H-ALL	112(B) HAPS	40 CFR Part 63, Subpart H	§ 63.170 § 63.162(a) § 63.162(c) [G]§ 63.162(g) § 63.162(h) [G]§ 63.171
9	251F	OP-UA12	63H-ALL	112(B) HAPS	40 CFR Part 63, Subpart H	[G]§ 63.169 § 63.162(a) § 63.162(c) [G]§ 63.162(f) [G]§ 63.162(g) § 63.162(h) [G]§ 63.171

**Applicable Requirements Summary  
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Table 1a: Additions**

Date:	<b>12/30/2024 (updated 9/26/2025)</b>	Regulated Entity No.:	<b>100258060</b>	Permit No.:	<b>O1628</b>
Company Name:	<b>Celanese Ltd.</b>	Area Name:	<b>Bay City Plant</b>		

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
9	251F	OP-UA12	63H-ALL	112(B) HAPS	40 CFR Part 63, Subpart H	[G]§ 63.169 § 63.162(a) § 63.162(c) [G]§ 63.162(f) [G]§ 63.162(g) § 63.162(h) [G]§ 63.171
9	251F	OP-UA12	63H-ALL	112(B) HAPS	40 CFR Part 63, Subpart H	[G]§ 63.165 § 63.162(a) § 63.162(c) [G]§ 63.162(g) § 63.162(h) [G]§ 63.171
9	251F	OP-UA12	63H-ALL	112(B) HAPS	40 CFR Part 63, Subpart H	[G]§ 63.166 § 63.162(a) § 63.162(c) [G]§ 63.162(g) § 63.162(h) [G]§ 63.171
9	251F	OP-UA12	63H-ALL	112(B) HAPS	40 CFR Part 63, Subpart H	[G]§ 63.169 § 63.162(a) § 63.162(c) [G]§ 63.162(f) [G]§ 63.162(g) § 63.162(h) [G]§ 63.171

**Applicable Requirements Summary  
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Date:	<b>12/30/2024 (updated 9/26/2025)</b>	Regulated Entity No.:	<b>100258060</b>	Permit No.:	<b>O1628</b>
Company Name:	<b>Celanese Ltd.</b>	Area Name:	<b>Bay City Plant</b>		

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
9	251F	OP-UA12	63H-ALL	112(B) HAPS	40 CFR Part 63, Subpart H	[G]§ 63.169 § 63.162(a) § 63.162(c) [G]§ 63.162(f) [G]§ 63.162(g) § 63.162(h) [G]§ 63.171
9	251F	OP-UA12	63H-ALL	112(B) HAPS	40 CFR Part 63, Subpart H	[G]§ 63.169 § 63.162(a) § 63.162(c) [G]§ 63.162(f) [G]§ 63.162(g) § 63.162(h) [G]§ 63.171
9	251F	OP-UA12	63H-ALL	112(B) HAPS	40 CFR Part 63, Subpart H	[G]§ 63.169 § 63.162(a) § 63.162(c) [G]§ 63.162(f) [G]§ 63.162(g) § 63.162(h) [G]§ 63.171

**Applicable Requirements Summary  
Form OP-REQ3 (Page 1)  
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Table 1a: Additions**

Date:	<b>12/30/2024 (updated 9/26/2025)</b>	Regulated Entity No.:	<b>100258060</b>	Permit No.:	<b>O1628</b>
Company Name:	<b>Celanese Ltd.</b>	Area Name:	<b>Bay City Plant</b>		

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
9	251F	OP-UA12	63EEEEH-ALL	112(B) HAPS	40 CFR Part 63, Subpart EEEE	§63.2346(c) §63.162(a), (c), [G](f) [G]63.162(g), (h) [G]§63.163 [G]§63.171 [G]§63.176 §63.2346(c) §63.2350(a) §63.2370(a)–Table 7.4.a.i §63.2370(a)–Table 7.4.a.ii §63.2396(e)(2)
9	251F	OP-UA12	63EEEEH-ALL	112(B) HAPS	40 CFR Part 63, Subpart EEEE	§63.2346(c) §63.162(a), (c), [G](f) [G]§63.162(g), (h) [G]§63.169)1 [G]§63.171 §63.2346(c) §63.2350(a) §63.2370(a)–Table 7.4.a.i §63.2370(a)–Table 7.4.a.ii §63.2396(e)(2)

**Applicable Requirements Summary  
Form OP-REQ3 (Page 1)  
Federal Operating Permit Program  
Table 1a: Additions**

Date: <b>12/30/2024 (updated 9/26/2025)</b>	Regulated Entity No.: <b>100258060</b>	Permit No.: <b>O1628</b>
Company Name: <b>Celanese Ltd.</b>	Area Name: <b>Bay City Plant</b>	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
9	251F	OP-UA12	63EEEEH-ALL	112(B) HAPS	40 CFR Part 63, Subpart EEEE	§63.2346(c) §63.162(a), (c), [G](g) §63.162(h) [G]§63.166 [G]§63.171 §63.2346(c) §63.2350(a) §63.2370(a)–Table 7.4.a.i §63.2370(a)–Table 7.4.a.ii §63.2396(e)(2)
9	251F	OP-UA12	63EEEEH-ALL	112(B) HAPS	40 CFR Part 63, Subpart EEEE	§63.2346(c) §63.162(a), (c), [G](f) [G]§63.162(g), (h) [G]§63.168 [G]§63.171 [G]§63.175 §63.2346(c) §63.2350(a) §63.2370(a)–Table 7.4.a.i §63.2370(a)–Table 7.4.a.ii §63.2396(e)(2)

**Applicable Requirements Summary  
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Table 1a: Additions**

Date: <b>12/30/2024 (updated 9/26/2025)</b>	Regulated Entity No.: <b>100258060</b>	Permit No.: <b>O1628</b>
Company Name: <b>Celanese Ltd.</b>	Area Name: <b>Bay City Plant</b>	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
9	251F	OP-UA12	63EEEEH-ALL	112(B) HAPS	40 CFR Part 63, Subpart EEEE	§63.2346(c) §63.162(a), (c), [G](f) [G]§63.162(g), (h) [G]§63.169j2 [G]§63.171 §63.2346(c) §63.2350(a) §63.2370(a)–Table 7.4.a.i §63.2370(a)–Table 7.4.a.ii §63.2396(e)(2)
9	251F	OP-UA12	63EEEEH-ALL	112(B) HAPS	40 CFR Part 63, Subpart EEEE	§63.2346(c) §63.162(a), (c), [G](g) §63.162(h) [G]§63.167 [G]§63.171 §63.2346(c) §63.2350(a) §63.2370(a)–Table 7.4.a.i §63.2370(a)–Table 7.4.a.ii §63.2396(e)(2)

**Applicable Requirements Summary  
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Table 1b: Additions**

Date: <b>12/30/2024 (updated 9/26/2025)</b>	Regulated Entity No.: <b>100258060</b>	Permit No.: <b>O1628</b>
Company Name: <b>Celanese Ltd.</b>	Area Name: <b>Bay City Plant</b>	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
1 2 3	GRP-OLDST5K	63EEEE-3	112(B) HAPS	None	§63.2343(a)	None
4	GRP-OLDST5K	63EEEE-2	112(B) HAPS	None	§63.2343(a) §63.2390(a)	None

**Applicable Requirements Summary  
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Table 1b: Additions**

Date: <b>12/30/2024 (updated 9/26/2025)</b>	Regulated Entity No.: <b>100258060</b>	Permit No.: <b>O1628</b>
Company Name: <b>Celanese Ltd.</b>	Area Name: <b>Bay City Plant</b>	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
5	251DTC	63EEEE-1	112(B) HAPS	§63.2346(c) §63.2346(d) §63.2346(d)(1) §63.2346(d)(2) §63.2362(b)(1) §63.2362(b)(2)	§63.2343(a) §63.2343(c)(3) §63.2350(c) [G]§63.2390(b) [G]§63.2390(c) §63.2390(d) [G]§63.2390(e) [G]§63.2390(f) §63.2390(g) [G]§63.2390(h) §63.2396(c) §63.2396(c)(1) §63.2396(d)(1) §63.2396(d)(2) §63.2396(d)(3) §63.2396(e) §63.2396(e)(1) §63.2396(e)(2) [G]§63.998(d)(1)	§63.2342(d) §63.2343(c)(c) §63.2343(c)(1)(i) §63.2343(c)(1)(ii)(A) §63.2343(c)(1)(iii) §63.2343(c)(2)(i) §63.2343(c)(2)(ii) §63.2343(d) §63.2343(d)(1) §63.2343(d)(3) §63.2343(d)(4) [G]§63.2382 [G]§63.2386 [G]§63.999(b) [G]§63.999(c)

**Applicable Requirements Summary  
Form OP-REQ3 (Page 2)  
Federal Operating Permit Program  
Table 1b: Additions**

Date: <b>12/30/2024 (updated 9/26/2025)</b>	Regulated Entity No.: <b>100258060</b>	Permit No.: <b>01628</b>
Company Name: <b>Celanese Ltd.</b>	Area Name: <b>Bay City Plant</b>	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
5	251DTC	63EEEE-2	112(B) HAPS	None	§63.2343(c)(3)	[G]§63.2343(c)(1), (c)(2)(i)-(ii) §63.2386(b) §63.2343(b)-Table 11.1.a [G]§63.2343(b)(1)-(2), (b)(3), (c) §63.2343(c)(1)-(3), (c)(10)(i)-(ii), (d) §63.2343(d)(4)(ii), (f), [G](i) [G]§63.2343(j)

**Applicable Requirements Summary  
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Table 1b: Additions**

Date: <b>12/30/2024 (updated 9/26/2025)</b>	Regulated Entity No.: <b>100258060</b>	Permit No.: <b>O1628</b>
Company Name: <b>Celanese Ltd.</b>	Area Name: <b>Bay City Plant</b>	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
6	251DTL	63EEEE-1	112(B) HAPS	§63.2346(c) §63.2346(d) §63.2346(d)(1) §63.2346(d)(2) §63.2362(b)(1) §63.2362(b)(2)	§63.2343(a) §63.2343(c)(3) §63.2350(c) [G]§63.2390(b) [G]§63.2390(c) §63.2390(d) [G]§63.2390(e) [G]§63.2390(f) §63.2390(g) [G]§63.2390(h) §63.2396(c) §63.2396(c)(1) §63.2396(d)(1) §63.2396(d)(2) §63.2396(d)(3) §63.2396(e) §63.2396(e)(1) §63.2396(e)(2) [G]§63.998(d)(1)	§63.2342(d) §63.2343(c)(c) §63.2343(c)(1)(i) §63.2343(c)(1)(ii)(A) §63.2343(c)(1)(iii) §63.2343(c)(2)(i) §63.2343(c)(2)(ii) §63.2343(d) §63.2343(d)(1) §63.2343(d)(3) §63.2343(d)(4) [G]§63.2382 [G]§63.2386 [G]§63.999(b) [G]§63.999(c)

**Applicable Requirements Summary  
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Federal Operating Permit Program  
Table 1b: Additions**

Date:	<b>12/30/2024 (updated 9/26/2025)</b>	Regulated Entity No.:	<b>100258060</b>	Permit No.:	<b>01628</b>
Company Name:	<b>Celanese Ltd.</b>	Area Name:	<b>Bay City Plant</b>		

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
6	251DTL	63EEEE-2	112(B) HAPS	None	§63.2343(c)(3)	[G]§63.2343(c)(1), (c)(2)(i)-(ii) §63.2386(b) §63.2343(b)-Table 11.1.a [G]§63.2343(b)(1)-(2), (b)(3), (c) §63.2343(c)(1)-(3), (c)(10)(i)-(ii), (d) §63.2343(d)(4)(ii), (f), [G](i) [G]§63.2343(j)

**Applicable Requirements Summary  
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Table 1b: Additions**

Date: <b>12/30/2024 (updated 9/26/2025)</b>	Regulated Entity No.: <b>100258060</b>	Permit No.: <b>O1628</b>
Company Name: <b>Celanese Ltd.</b>	Area Name: <b>Bay City Plant</b>	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
6	251DTL	63G-G1TR	112(B) HAPS	[G]§ 63.126(d)(3) § 63.127(a) § 63.127(a)(2) § 63.127(e) [G]§ 63.128(b) § 63.152(g)(1)(i) [G]§ 63.152(g)(1)(ii) § 63.152(g)(1)(iii) § 63.152(g)(1)(iv) [G]§ 63.152(g)(1)(v) [G]§ 63.172(f)(1) [G]§ 63.172(f)(2) § 63.172(g) [G]§ 63.172(h) [G]§ 63.172(k) [G]§ 63.172(l) [G]§ 63.180(b) [G]§ 63.180(d)	§ 63.129(a)(1), [G]§ 63.129(a)(5), § 63.130(a)(1), § 63.130(a)(2)(i), § 63.130(c) § 63.130(e) § 63.130(f),(f)(1)-(3) § 63.130(f)(3)(ii) [G]§ 63.152(a), [G]§ 63.152(f) § 63.152(g)(1), § 63.152(g)(1)(i) [G]§ 63.152(g)(1)(ii) § 63.152(g)(1)(iii)-(iv) [G]§ 63.152(g)(1)(v) [G]§ 63.152(g)(1)(vi) § 63.152(g)(2), § 63.152(g)(2)(i)- (iii) [G]§ 63.172(k) [G]§ 63.172(l) § 63.181(a) [G]§ 63.181(b) § 63.181(c) [G]§ 63.181(d) § 63.181(g), § 63.181(g)(1)(i)-(ii) [G]§ 63.181(g)(2) [G]§ 63.181(g)(3)	§ 63.129(a)(2)-(3), [G]§ 63.129(a)(5) § 63.130(d)(1),(2),(5) [G]§ 63.151(b), [G]§ 63.151(j), [G]§ 63.152(a) § 63.152(b) [G]§ 63.152(b)(1)-(2) § 63.152(b)(4) § 63.152(c)(1)-(2) § 63.152(c)(2)(i) [G]§ 63.152(c)(2)(ii) § 63.152(c)(2)(iii) § 63.152(c)(3) § 63.152(c)(3)(i)-(ii) § 63.152(c)(4)(ii) [G]§ 63.152(c)(6) § 63.152(g)(1) § 63.152(g)(2)(i)-(ii) [G]§ 63.182(a) [G]§ 63.182(b) § 63.182(c) [G]§ 63.182(c)(1) § 63.182(c)(4) [G]§ 63.182(d)

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Table 1b: Additions**

Date: <b>12/30/2024 (updated 9/26/2025)</b>	Regulated Entity No.: <b>100258060</b>	Permit No.: <b>O1628</b>
Company Name: <b>Celanese Ltd.</b>	Area Name: <b>Bay City Plant</b>	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
7	251DTL2	63EEEE-1	112(B)-HAPS	§63.2346(e) §63.2346(d) §63.2346(d)(1) §63.2346(d)(2) §63.2362(b)(1) §63.2362(b)(2)	§63.2343(a) §63.2343(e)(3) §63.2350(e) [G]§63.2390(b) [G]§63.2390(e) §63.2390(d) [G]§63.2390(e) [G]§63.2390(f) §63.2390(g) [G]§63.2390(h) §63.2396(e) §63.2396(e)(1) §63.2396(d)(1) §63.2396(d)(2) §63.2396(d)(3) §63.2396(e) §63.2396(e)(1) §63.2396(e)(2) [G]§63.998(d)(1)	§63.2342(d) §63.2343(e)(e) §63.2343(e)(1)(i) §63.2343(e)(1)(ii)(A) §63.2343(e)(1)(iii) §63.2343(e)(2)(i) §63.2343(e)(2)(ii) §63.2343(d) §63.2343(d)(1) §63.2343(d)(3) §63.2343(d)(4) [G]§63.2382 [G]§63.2386 [G]§63.999(b) [G]§63.999(e)

**Applicable Requirements Summary  
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Federal Operating Permit Program  
Table 1b: Additions**

Date: <b>12/30/2024 (updated 9/26/2025)</b>	Regulated Entity No.: <b>100258060</b>	Permit No.: <b>01628</b>
Company Name: <b>Celanese Ltd.</b>	Area Name: <b>Bay City Plant</b>	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
7	251DTL2	R5211-CVS	VOC	§ 115.212(b)(3)(B) [G]§ 115.212(b)(3)(C) § 115.214(b)(1)(A) § 115.214(b)(1)(A)(i) § 115.214(b)(1)(A)(ii) § 115.214(b)(1)(A)(iii) § 115.215 § 115.215(1) § 115.215(10) [G]§ 115.215(2) [G]§ 115.215(3) § 115.215(4) § 115.215(5) § 115.215(8) § 115.215(9) § 115.216(1) § 115.216(1)(B)	§ 115.216 § 115.216(1) § 115.216(1)(B) § 115.216(2) § 115.216(3)(A) § 115.216(3)(A)(i) § 115.216(3)(A)(ii) § 115.216(3)(A)(iii) § 115.216(3)(B)	None

**Applicable Requirements Summary  
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Table 1b: Additions**

Date: <b>12/30/2024 (updated 9/26/2025)</b>	Regulated Entity No.: <b>100258060</b>	Permit No.: <b>01628</b>
Company Name: <b>Celanese Ltd.</b>	Area Name: <b>Bay City Plant</b>	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
8	251DM1205	63EEEE-MAX	Opacity	§63.670(b) §63.670(c) §63.670(d)(2) §63.670(e) §63.670(g) [G]§63.670(h) [G]§63.670(i) [G]§63.670(j) [G]§63.670(o)(1) [G]§63.670(o)(5) [G]§63.670(k) [G]§63.670(l) [G]§63.670(m) [G]§63.671(a) [G]§63.671(b) [G]§63.671(c) [G]§63.671(d) [G]§63.671(e)	[G]§63.670(h) [G]§63.670(i) [G]§63.670(j) [G]§63.670(o)(1) [G]§63.670(o)(5) §63.670(o)(6) §63.670(p) [G]§63.671(a) [G]§63.671(b)	[G]§63.670(h) [G]§63.670(j) [G]§63.670(l) [G]§63.670(o)(2) §63.670(q)

**Applicable Requirements Summary  
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Table 1b: Additions**

Date: <b>12/30/2024 (updated 9/26/2025)</b>	Regulated Entity No.: <b>100258060</b>	Permit No.: <b>O1628</b>
Company Name: <b>Celanese Ltd.</b>	Area Name: <b>Bay City Plant</b>	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
8	251DM1205	63EEEE-NORM	Opacity	§63.670(b) §63.670(c) §63.670(d)(1) §63.670(e) §63.670(g) [G]§63.670(h) [G]§63.670(i) [G]§63.670(j) [G]§63.670(k) [G]§63.670(m) [G]§63.671(a) [G]§63.671(b) [G]§63.671(c) [G]§63.671(d) [G]§63.671(e)	[G]§63.670(h) [G]§63.670(i) [G]§63.670(j) [G]§63.670(o)(1) [G]§63.670(o)(5) §63.670(o)(6) §63.670(p) [G]§63.671(a) [G]§63.671(b)	[G]§63.670(h) [G]§63.670(j) [G]§63.670(o)(2) §63.670(q)
9	251F	63H-ALL	112(B) HAPS	[G]§ 63.180(d)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c) [G]§ 63.181(i) § 63.181(j)	[G]§ 63.182(a) [G]§ 63.182(b)
9	251F	63H-ALL	112(B) HAPS	[G]§ 63.164 [G]§ 63.180(b) [G]§ 63.180(c) [G]§ 63.180(d)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c) [G]§ 63.181(d) [G]§ 63.181(f)	[G]§ 63.182(a) [G]§ 63.182(b) § 63.182(c) [G]§ 63.182(c)(1) § 63.182(c)(4) [G]§ 63.182(d)

**Applicable Requirements Summary  
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Federal Operating Permit Program  
Table 1b: Additions**

Date: <b>12/30/2024 (updated 9/26/2025)</b>	Regulated Entity No.: <b>100258060</b>	Permit No.: <b>O1628</b>
Company Name: <b>Celanese Ltd.</b>	Area Name: <b>Bay City Plant</b>	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
9	251F	63H-ALL	112(B) HAPS	[G]§ 63.168 [G]§ 63.175 [G]§ 63.180(b) [G]§ 63.180(d)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c) [G]§ 63.181(d) § 63.181(h) [G]§ 63.181(h)(1) [G]§ 63.181(h)(2) § 63.181(h)(4) [G]§ 63.181(h)(5) § 63.181(h)(6) § 63.181(h)(7)	[G]§ 63.182(a) [G]§ 63.182(b) § 63.182(c) [G]§ 63.182(c)(1) § 63.182(c)(4) [G]§ 63.182(d)
9	251F	63H-ALL	112(B) HAPS	[G]§ 63.175 [G]§ 63.180(b) [G]§ 63.180(d)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c) § 63.181(h) [G]§ 63.181(h)(1) [G]§ 63.181(h)(2) § 63.181(h)(4) [G]§ 63.181(h)(5) § 63.181(h)(6) § 63.181(h)(7)	[G]§ 63.182(a) [G]§ 63.182(b) § 63.182(c) [G]§ 63.182(c)(1) § 63.182(c)(4) [G]§ 63.182(d)
9	251F	63H-ALL	112(B) HAPS	[G]§ 63.163 [G]§ 63.176 [G]§ 63.180(b) [G]§ 63.180(d)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c) [G]§ 63.181(d) § 63.181(h) [G]§ 63.181(h)(3) § 63.181(h)(4) [G]§ 63.181(h)(5) § 63.181(h)(6) § 63.181(h)(7) § 63.181(h)(8)	[G]§ 63.182(a) [G]§ 63.182(b) § 63.182(c) [G]§ 63.182(c)(1) § 63.182(c)(4) [G]§ 63.182(d)

**Applicable Requirements Summary  
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Table 1b: Additions**

Date: <b>12/30/2024 (updated 9/26/2025)</b>	Regulated Entity No.: <b>100258060</b>	Permit No.: <b>O1628</b>
Company Name: <b>Celanese Ltd.</b>	Area Name: <b>Bay City Plant</b>	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
9	251F	63H-ALL	112(B) HAPS	[G]§ 63.174 [G]§ 63.180(b) [G]§ 63.180(d)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c) [G]§ 63.181(d)	[G]§ 63.182(a) [G]§ 63.182(b) § 63.182(c) [G]§ 63.182(c)(1) § 63.182(c)(4) [G]§ 63.182(d)
9	251F	63H-ALL	112(B) HAPS	[G]§ 63.173 [G]§ 63.180(b) [G]§ 63.180(d)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c) [G]§ 63.181(d)	[G]§ 63.182(a) [G]§ 63.182(b) § 63.182(c) [G]§ 63.182(c)(1) § 63.182(c)(4) [G]§ 63.182(d)
9	251F	63H-ALL	112(B) HAPS	[G]§ 63.180(b) [G]§ 63.180(d)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c)	[G]§ 63.182(a) [G]§ 63.182(b) § 63.182(c) [G]§ 63.182(c)(1) § 63.182(c)(4) [G]§ 63.182(d)
9	251F	63H-ALL	112(B) HAPS	[G]§ 63.169 [G]§ 63.180(b) [G]§ 63.180(d)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c) [G]§ 63.181(d)	[G]§ 63.182(a) [G]§ 63.182(b) § 63.182(c) [G]§ 63.182(c)(1) § 63.182(c)(4) [G]§ 63.182(d)

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Date: <b>12/30/2024 (updated 9/26/2025)</b>	Regulated Entity No.: <b>100258060</b>	Permit No.: <b>O1628</b>
Company Name: <b>Celanese Ltd.</b>	Area Name: <b>Bay City Plant</b>	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
9	251F	63H-ALL	112(B) HAPS	[G]§ 63.169 [G]§ 63.180(b) [G]§ 63.180(d)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c) [G]§ 63.181(d)	[G]§ 63.182(a) [G]§ 63.182(b) § 63.182(c) [G]§ 63.182(c)(1) § 63.182(c)(4) [G]§ 63.182(d)
9	251F	63H-ALL	112(B) HAPS	[G]§ 63.165 [G]§ 63.180(b) [G]§ 63.180(c) [G]§ 63.180(d)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c) [G]§ 63.181(f)	[G]§ 63.182(a) [G]§ 63.182(b) § 63.182(c) [G]§ 63.182(c)(1) § 63.182(c)(4) [G]§ 63.182(d)
9	251F	63H-ALL	112(B) HAPS	[G]§ 63.180(b) [G]§ 63.180(d)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c) [G]§ 63.181(i)	[G]§ 63.182(a) [G]§ 63.182(b) § 63.182(c) [G]§ 63.182(c)(1) § 63.182(c)(4) [G]§ 63.182(d)
9	251F	63H-ALL	112(B) HAPS	[G]§ 63.169 [G]§ 63.180(b) [G]§ 63.180(d)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c) [G]§ 63.181(d) [G]§ 63.181(i)	[G]§ 63.182(a) [G]§ 63.182(b) § 63.182(c) [G]§ 63.182(c)(1) § 63.182(c)(4) [G]§ 63.182(d)

**Applicable Requirements Summary**  
**Form OP-REQ3 (Page 2)**  
**Federal Operating Permit Program**  
**Table 1b: Additions**

Date: <b>12/30/2024 (updated 9/26/2025)</b>	Regulated Entity No.: <b>100258060</b>	Permit No.: <b>O1628</b>
Company Name: <b>Celanese Ltd.</b>	Area Name: <b>Bay City Plant</b>	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
9	251F	63H-ALL	112(B) HAPS	[G]§ 63.169 [G]§ 63.180(b) [G]§ 63.180(d)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c) [G]§ 63.181(d) [G]§ 63.181(i)	[G]§ 63.182(a) [G]§ 63.182(b) § 63.182(c) [G]§ 63.182(c)(1) § 63.182(c)(4) [G]§ 63.182(d)
9	251F	63H-ALL	112(B) HAPS	[G]§ 63.169 [G]§ 63.180(b) [G]§ 63.180(d)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c) [G]§ 63.181(d) [G]§ 63.181(i)	[G]§ 63.182(a) [G]§ 63.182(b) § 63.182(c) [G]§ 63.182(c)(1) § 63.182(c)(4) [G]§ 63.182(d)
9	251F	63H-ALL	112(B) HAPS	[G]§ 63.169 [G]§ 63.180(b) [G]§ 63.180(d)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c) [G]§ 63.181(d) [G]§ 63.181(i)	[G]§ 63.182(a) [G]§ 63.182(b) § 63.182(c) [G]§ 63.182(c)(1) § 63.182(c)(4) [G]§ 63.182(d)

**Applicable Requirements Summary  
Form OP-REQ3 (Page 2)  
Federal Operating Permit Program  
Table 1b: Additions**

Date: <b>12/30/2024 (updated 9/26/2025)</b>	Regulated Entity No.: <b>100258060</b>	Permit No.: <b>O1628</b>
Company Name: <b>Celanese Ltd.</b>	Area Name: <b>Bay City Plant</b>	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
9	251F	63EEEEH-ALL	112(B) HAPS	[G]§63.163 [G]§63.176 [G]§63.180(b), (d) §63.2350(d) §63.2378(a)–Table 10.5.a.i	§63.181(a), [G](b), (c) [G]§63.181(d), (h), [G](h)(3) §63.181(h)(4), [G](h)(5), (h)(6)-(9) §63.2350(d) §63.2370(a)–Table 7.4.a.ii [G]§63.2390(b) §63.2394(a), (b), ©	[G]§63.182(a), [G](b), (c) [G]§63.182(c)(1), (c)(4), [G](d) §63.2382(a), (b)(2), (d)(1) [G]§63.2382(d)(2), (d)(3) §63.2386(a), (b) §63.2386(b)–Table 11.1.a §63.2386(b)–Table 11.1.b §63.2386(b)–Table 11.2.a.i [G]§63.2386(b)(1)-(2), (b)(3), (c) §63.2386(c)(1)-(4), (c)(6)-(7), (c)(12) §63.2386(d), (d)(2), (e)-(f) [G]§63.2386(i), [G](j) §63.2396(e)(2)
9	251F	63EEEEH-ALL	112(B) HAPS	[G]§63.169 [G]§63.176 [G]§63.180(b), (d) §63.2350(d) §63.2378(a)–Table 10.5.a.i	§63.181(a), [G](b), (c) [G]§63.181(d) [G]§63.181(i) §63.2350(d) §63.2370(a)–Table 7.4.a.ii [G]§63.2390(b) §63.2394(a), (b), (c)	[G]§63.182(a), [G](b), (c) [G]§63.182(c)(1), (c)(4), [G](d) §63.2382(a), (b)(2), (d)(1) [G]§63.2382(d)(2), (d)(3) §63.2386(a), (b) §63.2386(b)–Table 11.1.a §63.2386(b)–Table 11.1.b §63.2386(b)–Table 11.2.a.i [G]§63.2386(b)(1)-(2), (b)(3), (c) §63.2386(c)(1)-(4), (c)(6)-(7), (c)(12) §63.2386(d), (d)(2), (e)-(f) [G]§63.2386(i), [G](j) §63.2396(e)(2)

**Applicable Requirements Summary  
Form OP-REQ3 (Page 2)  
Federal Operating Permit Program  
Table 1b: Additions**

Date: <b>12/30/2024 (updated 9/26/2025)</b>	Regulated Entity No.: <b>100258060</b>	Permit No.: <b>O1628</b>
Company Name: <b>Celanese Ltd.</b>	Area Name: <b>Bay City Plant</b>	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
9	251F	63EEEEH-ALL	112(B) HAPS	[G]§63.180(b), (d) §63.2350(d) §63.2378(a)–Table 10.5.a.i	§63.181(a), [G](b), (c) §63.2350(d) §63.2370(a)–Table 7.4.a.ii [G]§63.2390(b) §63.2394(a), (b), (c) [G]§63.181(i)	[G]§63.182(a), [G](b), (c) [G]§63.182(c)(1), (c)(4), [G](d) §63.2382(a), (b)(2), (d)(1) [G]§63.2382(d)(2), (d)(3) §63.2386(a), (b) §63.2386(b)–Table 11.1.a §63.2386(b)–Table 11.1.b §63.2386(b)–Table 11.2.a.i [G]§63.2386(b)(1)–(2), (b)(3), (c) §63.2386(c)(1)–(4), (c)(6)–(7), (c)(12) §63.2386(d), (d)(2), (e)–(f) [G]§63.2386(i), [G](j) §63.2396(e)(2)
9	251F	63EEEEH-ALL	112(B) HAPS	[G]§63.168 [G]§63.175 [G]§63.180(b), (d) §63.2350(d) §63.2378(a)–Table 10.5.a.i	§63.181(a), [G](b), (c) [G]§63.181(d), (h), [G](h)(1)–(2) §63.181(h)(4), [G](h)(5), (h)(6)–(7) §63.181(h)(9) §63.2350(d) §63.2370(a)–Table 7.4.a.ii [G]§63.2390(b) §63.2394(a), (b), (c)	[G]§63.182(a), [G](b), (c) [G]§63.182(c)(1), (c)(4), [G](d) §63.2382(a), (b)(2), (d)(1) [G]§63.2382(d)(2), (d)(3) §63.2386(a), (b) §63.2386(b)–Table 11.1.a §63.2386(b)–Table 11.1.b §63.2386(b)–Table 11.2.a.i [G]§63.2386(b)(1)–(2), (b)(3), (c) §63.2386(c)(1)–(4), (c)(6)–(7), (c)(12) §63.2386(d), (d)(2), (e)–(f) [G]§63.2386(i), [G](j) §63.2396(e)(2)

**Applicable Requirements Summary  
Form OP-REQ3 (Page 2)  
Federal Operating Permit Program  
Table 1b: Additions**

Date: <b>12/30/2024 (updated 9/26/2025)</b>	Regulated Entity No.: <b>100258060</b>	Permit No.: <b>O1628</b>
Company Name: <b>Celanese Ltd.</b>	Area Name: <b>Bay City Plant</b>	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
9	251F	63EEEEH-ALL	112(B) HAPS	[G]§63.169 [G]§63.175 [G]§63.180(b), (d) §63.2350(d) §63.2378(a)–Table 10.5.a.i	§63.181(a), [G](b), (c) [G]§63.181(d) [G]§63.181(i) §63.2350(d) §63.2370(a)–Table 7.4.a.ii [G]§63.2390(b) §63.2394(a), (b), (c)	[G]§63.182(a), [G](b), (c) [G]§63.182(c)(1), (c)(4), [G](d) §63.2382(a), (b)(2), (d)(1) [G]§63.2382(d)(2), (d)(3) §63.2386(a), (b) §63.2386(b)–Table 11.1.a §63.2386(b)–Table 11.1.b §63.2386(b)–Table 11.2.a.i [G]§63.2386(b)(1)–(2), (b)(3), (c) §63.2386(c)(1)–(4), (c)(6)–(7), (c)(12) §63.2386(d), (d)(2), (e)–(f) [G]§63.2386(i), [G](j) §63.2396(e)(2)
9	251F	63EEEEH-ALL	112(B) HAPS	[G]§63.175 [G]§63.180(b), (d) §63.2350(d) §63.2378(a)–Table 10.5.a.i	§63.181(a), [G](b), (c) §63.2350(d) §63.2370(a)–Table 7.4.a.ii [G]§63.2390(b) §63.2394(a), (b), (c) [G]§63.181(i)	[G]§63.182(a), [G](b), (c) [G]§63.182(c)(1), (c)(4), [G](d) §63.2382(a), (b)(2), (d)(1) [G]§63.2382(d)(2), (d)(3) §63.2386(a), (b) §63.2386(b)–Table 11.1.a §63.2386(b)–Table 11.1.b §63.2386(b)–Table 11.2.a.i [G]§63.2386(b)(1)–(2), (b)(3), (c) §63.2386(c)(1)–(4), (c)(6)–(7), (c)(12) §63.2386(d), (d)(2), (e)–(f) [G]§63.2386(i), [G](j) §63.2396(e)(2)

**Texas Commission on Environmental Quality  
Federal Operating Permit Program  
Individual Unit Summary for Revisions  
Form OP-SUMR  
Table 1**

Date	Permit No.	Regulated Entity No.
12/30/2024 (updated 9/26/2025)	O1628	100258060

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
A	1	V7033A	OP-REQ3 <del>OP-UA1</del> OP-UA3	Storage Tank		4449	
A	2	V7033B	OP-REQ3 <del>OP-UA1</del> OP-UA3	Storage Tank		4449	
A	3	251V1306	OP-REQ3 <del>OP-UA1</del> OP-UA3	Storage Tank		4449	
	5	251DTC	OP-REQ3 <del>OP-UA1</del> OP-UA4	Railcar Loading Area General Railcar Loading		4449 106.473/09/04/2000	
	6	251DTL	OP-REQ3 <del>OP-UA1</del> OP-UA4	Truck Loading Rack General		4449 106.473/09/04/2000	
A	7	<del>251DTL2</del>	<del>OP-REQ3</del> <del>OP-UA1</del> <del>OP-UA4</del>	Small Tank Truck Loading		4449 <del>106.473/09/04/2000</del> 106.261/11/01/2003 [142397] 106.262/11/01/2003 [142397]	
A	9	251F	OP-REQ3 OP-UA12	Shipping Equipment Fugitives		106.261/11/01/2003 [163480] 106.262/11/01/2003 [163480] 106.262/11/01/2003 [176028]	

Texas Commission on Environmental Quality  
 Federal Operating Permit Program  
 Individual Unit Summary for Revisions  
 Form OP-SUMR  
 Table 2

Date	Permit No.	Regulated Entity No.
12/30/2024 (updated 9/26/2025)	O1628	100258060

Revision No.	ID No.	Applicable Form	Group AI	Group ID No.
1	V7033A	<del>OP-UA1</del> OP-UA3	A	GRP-OLDST5K
2	V7033B	<del>OP-UA1</del> OP-UA3	A	GRP-OLDST5K
3	251V1306	<del>OP-UA1</del> OP-UA3	A	GRP-OLDST5K



**Loading/Unloading Operations Attributes**  
**Form OP-UA4 (Page 21)**  
**Federal Operating Permit Program**  
**Table 11a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)**  
**Subpart EEEE: National Emission Standard for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline)**  
**Synthetic Organic Chemical Manufacturing Industry for Transfer Operations**  
**Texas Commission on Environmental Quality**

Date	Permit No.:	Regulated Entity No.
12/30/2024 (updated 9/26/2025)	O1628	100258060

Unit ID No.	SOP Index No.	Means of Compliance	Emission Type	Combination of Control Devices	Control Device	Control Device ID No.	Meets 63.988(b)(2)	Performance Test	Continuous Monitoring System
251DTC	63EEEE-1	98PR	LOW3	NO	FLARE	251DM1205	-	-	-
251DTL	63EEEE-1	98PR	LOW3	NO	FLARE	251DM1205	-	-	-
251DTC	63EEEE-2	T2-	-	-	-	-	-	-	-
251DTL	63EEEE-2	T2-	-	-	-	-	-	-	-

**Loading/Unloading Operations Attributes**  
**Form OP-UA4 (Page 21)**  
**Federal Operating Permit Program**  
**Table 11a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)**  
**Subpart EEEE: National Emission Standard for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline)**  
**Synthetic Organic Chemical Manufacturing Industry for Transfer Operations**  
**Texas Commission on Environmental Quality**

Date	Permit No.:	Regulated Entity No.
12/30/2024 (updated 9/26/2025)	O1628	100258060

Unit ID No.	SOP Index No.	Bypass Line	ALT 63SS MON Parameters	Combination of Control Devices	Prior Eval	Assessment Waiver	Formaldehyde	Negative Pressure
251DTC	63EEEE-1	NONE	-	-	-	-	-	-
251DTL	63EEEE-1	NONE	-	-	-	-	-	-



To: Ashcraft, Jennifer, Celanese <jennifer.ashcraft@celanese.com>  
 Cc: Tammy Hartmann (tammy.hartmann@tricordconsulting.com) <tammy.hartmann@tricordconsulting.com>; Audra Olson (Audra.Olson@TRICORDconsulting.com) <Audra.Olson@tricordconsulting.com>  
 Subject: [EXT]Re: FW: Technical Review -- FOP O1628/Project 38302, Celanese Ltd./Bay City Plant

**CAUTION: This email originated from outside Celanese. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Emily- On behalf of Celanese Ltd., Bay City Plant, TRICORD is providing the attached the updated forms for Project 38302. We realized that OP-UA4 was not the only form required to be included in the application for 40 CFR 63 Subpart EEEE due to the new forms issued by TCEQ, so we're including all of them as noted below.

- Revisions 1, 2 & 3: Unit IDs V7033A, V7033B & 251V1306 – We have removed OP-UA1 from the application and have replaced it with OP-UA3. We have also added a request to add this Unit ID to a new Group ID (thus removing Revision #4 from the application as shown with a strikethrough on OP-2 Table 2).
- Revisions 5 & 6: Unit IDs 251DTC & 251DTL – We have removed OP-UA1 from the application and have replaced it with OP-UA4.
- Revision 7: Unit ID 251DTL2 – We have removed this line item entirely from application as shown with a strikethrough on OP-2 Table 2 (we realized this Unit ID is not necessary as the applicability is already represented under Unit ID 251DTL)
- Revision 8: Unit ID 251DM1205 – no changes
- Revision 9: Unit ID 251F – We are adding 40 CFR 63 Subpart EEEE applicability via OP-UA12
- Revision 10: Unit ID 251DBL – no changes
- Revision 11: Unit ID TOTES – no changes

Please let us know if there are any questions/concerns.

Have a great weekend!

Nelwyn Mohrmann

**TRICORD**

402A West Palm Valley Blvd., PMB348  
 Round Rock, TX 78664  
 Office and Fax: 888.900.0746 x 725  
 Cell (preferred): 512.968.7158  
 E-mail: Nelwyn.Mohrmann@TRICORDConsulting.com  
 Web: www.TRICORDConsulting.com

From: Emily Knodell <Emily.Knodell@tceq.texas.gov>  
 Sent: Friday, September 19, 2025 3:26 PM  
 To: Ashcraft, Jennifer, Celanese <jennifer.ashcraft@celanese.com>  
 Subject: [EXT]RE: Technical Review -- FOP O1628/Project 38302, Celanese Ltd./Bay City Plant

**CAUTION: This email originated from outside Celanese. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Good afternoon Ms. Ashcraft,

During technical review, the following items were found. Please resolve by **09/26/2025**.

1. **Form OP-UA4:** In the application, multiple units subject to 40 CFR Part 63, Subpart EEEE were provided on an OP-UA 1 (as pictured below). At the time you created your application, we did not have a unit attribute form for 40 CFR Part 63, Subpart EEEE and general data was normally provided on OP-UA1, as was done in this case. We now have 40 CFR Part 63 addressed on Form OP-UA4 (Loading/Unloading Operations), Table 11 (Title V Release 04/25). Please add these units to Form OP-UA4.

Texas Commission on Environmental Quality  
 Miscellaneous Unit Attributes  
 Form OP-UA1 (Page 1)  
 Federal Operating Permit Program

Date:		12/30/2024				
Permit No.:		O1628				
Regulated Entity No.:		100258060				
Unit ID No.	SOP/GOP Index No.	Unit Type	Date Constructed/Placed in Service	Functionally Identical Replacement	Maximum Rated Capacity	Technical Information and Unit Description
V7033A	63EEEE-2	EP				Storage tank less than 5,000 gallon capacity; subject to 40 CFR 63 Subpart EEEE recordkeeping requirements.
V7033B	63EEEE-2	EP				Storage tank less than 5,000 gallon capacity; subject to 40 CFR 63 Subpart EEEE recordkeeping requirements.
251V1306	63EEEE-2	EP				Storage tank less than 5,000 gallon capacity; subject to 40 CFR 63 Subpart EEEE recordkeeping requirements.
251DTC	63EEEE-1	EP				Transfer rack subject to 40 CFR 63 Subpart EEEE loading control requirements and associated equipment leak component requirements.
251DTL	63EEEE-1	EP				Transfer rack subject to 40 CFR 63 Subpart EEEE loading control requirements and associated equipment leak component requirements.
251DTL2	63EEEE-1	EP				Transfer rack subject to 40 CFR 63 Subpart EEEE loading control requirements and associated equipment leak component requirements.

TCEQ 10044 (APDQ 5756v2 Revised 08/21) OP-UA1  
 This form for use by facilities subject to air quality permit requirements and may be revised periodically. (Title V Release 10/95)

Let me know if you have any questions.

Best Regards,

Emily L. Knodell  
Permit Reviewer  
TCEQ – APD – OP Section (Title V)  
(512) 239-3107



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**From:** Emily Knodell  
**Sent:** Monday, July 21, 2025 11:25 AM  
**To:** Ashcraft, Jennifer, Celanese <[jennifer.ashcraft@celanese.com](mailto:jennifer.ashcraft@celanese.com)>  
**Subject:** Technical Review -- FOP O1628/Project 38302, Celanese Ltd./Bay City Plant

Good morning Ms. Ashcraft,

My name is Emily Knodell and I have been assigned to the Federal Operating Permit (FOP) *revision* application of Permit No. **O1628** for *Celanese Ltd./Bay City Plant*. This application has been assigned Project No. **38302**. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

In addition, I wanted to let you know that EPA has, on occasion, objected to Title V permits based on the following:

- a. NSR permit and PBR monitoring sufficiency –please refer to our periodic monitoring guidance for reference of monitoring that EPA has, so far, considered sufficient.
- b. Reference to confidential business information (CBI) in NSR permits and PBR submittals.
- c. High level terms in the SOP Applicable Requirement Summary Table. The high level terms are sometimes used in SOPs when unit attribute forms have not yet been updated due to regulatory amendments.
- d. Accuracy of PBR information provided on the supplemental table and in the permit – please refer to Forms OP-PBRSUP and OP-REQ1 Instructions.

If you have any questions or concerns on any of these items or think you need to do any additional updates, let me know and we can discuss further.

Application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO/DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. Application updates that are provided through email or physical mail require certification using an original signature OP-CRO1.

Please notify me when these updates have been submitted.

**As required on Form OP-1, question IV.D, please remember the FOP application and all application updates must be submitted to EPA Region 6 at [R6AirPermitsTX@epa.gov](mailto:R6AirPermitsTX@epa.gov) and to the TCEQ regional office having jurisdiction. This submittal information can be found on our website at [Where to Submit FOP Applications and Permit-Related Documents](#).**

Please review the "SOP Technical Review Fact Sheet" located at [http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\\_V/sop\\_wdp\\_factsheet.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_factsheet.pdf). This guidance contains important information regarding the review process and application update procedures. Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

I would appreciate a quick confirmation that this email has reached you.

Thank you for your cooperation.

Sincerely,

**Emily L. Knodell**  
Permit Reviewer  
OA/Air Permits Division/OP Section  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[emily.knodell@tceq.texas.gov](mailto:emily.knodell@tceq.texas.gov)

Phone: (512) 239-3107  
Fax: (512) 239-1400



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## Texas Commission on Environmental Quality

Title V Existing

1628

### Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	BAY CITY PLANT
Does the site have a physical address?	Yes
Physical Address	
Number and Street	2001 FM 3057
City	BAY CITY
State	TX
ZIP	77414
County	MATAGORDA
Latitude (N) (##.#####)	28.861666
Longitude (W) (-###.#####)	96.019444
Primary SIC Code	2869
Secondary SIC Code	
Primary NAICS Code	325199
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN100258060
What is the name of the Regulated Entity (RE)?	CELANESE BAY CITY PLANT
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	2001 FM 3057
City	BAY CITY
State	TX
ZIP	77414
County	MATAGORDA
Latitude (N) (##.#####)	28.5142
Longitude (W) (-###.#####)	-96.011
Facility NAICS Code	
What is the primary business of this entity?	ORGANIC CHEMICALS MNFG

## Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN600130850
Type of Customer	Partnership
Full legal name of the applicant:	
Legal Name	Celanese Ltd.
Texas SOS Filing Number	8495110
Federal Tax ID	752622526
State Franchise Tax ID	17526225267
State Sales Tax ID	
Local Tax ID	
DUNS Number	26040709
Number of Employees	
Independently Owned and Operated?	Yes

## Responsible Official Contact

Person TCEQ should contact for questions about this application:	
Organization Name	CELANESE LTD
Prefix	MR
First	DONALD
Middle	
Last	BERTHELOT
Suffix	
Credentials	
Title	DIRECTOR PRODUCTION
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	PO BOX 509
Routing (such as Mail Code, Dept., or Attn:)	
City	BAY CITY
State	TX
ZIP	77404

Phone (###-###-####)	9792160314
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	9792160381
E-mail	donald.berthelot@celanese.com

## Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.

Organization Name	JENNIFER ASHCRAFT(CELANESE LTD... )
Prefix	CELANESE LTD
First	MS
Middle	JENNIFER
Last	ASHCRAFT
Suffix	
Credentials	
Title	ENVIRONMENTAL MANAGER
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	PO BOX 509
Routing (such as Mail Code, Dept., or Attn:)	
City	BAY CITY
State	TX
ZIP	77404
Phone (###-###-####)	9792160375
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	9792160381
E-mail	jennifer.ashcraft@celanese.com

## Title V General Information - Existing

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	28 Deg 51 Min 42 Sec

3) Permit Longitude Coordinate:	96 Deg 1 Min 10 Sec
4) Is this submittal a new application or an update to an existing application?	New Application
4.1. What type of permitting action are you applying for?	Streamlined Revision
4.1.1. Are there any permits that should be voided upon issuance of this permit application through permit conversion?	No
4.1.2. Are there any permits that should be voided upon issuance of this permit application through permit consolidation?	No
5) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?	No

## Title V Attachments Existing

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Attach OP-1 (Site Information Summary)

Attach OP-2 (Application for Permit Revision/Renewal)

Attach OP-REQ1 (Application Area-Wide Applicability Determinations and General Information)

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

Attach OP-SUMR (Individual Unit Summary for Revisions)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

If applicable, attach OP-AR1 (Acid Rain Permit Application)

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name	<a href=/ePermitsExternal/faces/file?fileId=262729>JOA-022_TitleV_O1628_MinorRevisionApplication_6.10.25.pdf</a>
Hash	2637CB3D553940ADB318930A8BF795410FF6C9B2BACAD892889C31545C300BDD
MIME-Type	application/pdf

An additional space to attach any other necessary information needed to complete the permit.

## Expedite Title V

1) Per Texas Health and Safety Code, Section 382.05155, does the applicant want to expedite the processing of this application?	No
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## Certification

I certify that I am the Responsible Official for this application and that, based on information and belief formed after reasonable inquiry, the statements and information on this form are true, accurate, and complete.

1. I am Donald A Berthelot, the owner of the STEERS account ER084362.
2. I have the authority to sign this data on behalf of the applicant named above.
3. I have personally examined the foregoing and am familiar with its content and the content of any attachments, and based upon my personal knowledge and/or inquiry of any individual responsible for information contained herein, that this information is true, accurate, and complete.
4. I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time.
5. I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.
6. I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcement of a state and/or federal environmental program and must be true and complete to the best of my knowledge.
7. I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.
8. I am knowingly and intentionally signing Title V Existing 1628.
9. My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEQ.

OWNER OPERATOR Signature: Donald A Berthelot OWNER OPERATOR

Account Number:	ER084362
Signature IP Address:	170.85.11.102
Signature Date:	2025-06-10
Signature Hash:	265670ECD9D3D5D9187F34A82840A2303E2F1249B964BDCF4BFAD9EF89F3192A

Form Hash Code at time of Signature:

E582DFF7E81D1CBA8E439E42AAD62353A4168D3F3B98AA0287FBDC4B128C05A0

## Submission

---

Reference Number:

The application reference number is 792412

Submitted by:

The application was submitted by ER084362/Donald A Berthelot

Submitted Timestamp:

The application was submitted on 2025-06-10 at 11:07:26 CDT

Submitted From:

The application was submitted from IP address 170.85.11.102

Confirmation Number:

The confirmation number is 658034

Steers Version:

The STEERS version is 6.91

Permit Number:

The permit number is 1628

## Additional Information

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Application Creator: This account was created by Jennifer O Ashcraft

December 27, 2024

ENV-JOA-022-24

***Certified Mail No.: 7018 3090 0001 9449 4250******Return Receipt Requested***Texas Commission on Environmental Quality  
Air Permits Initial Review Team (APIRT), MC 161  
P. O. Box 13087  
Austin, Texas 78711-3087**Re: Site Operating Permit No. O1628 Minor Revision Application  
Celanese Ltd. Bay City Plant  
Customer Reference Number: CN600130850  
Regulated Entity Number: RN100258060**

To Whom It May Concern:

Celanese Ltd. Bay City Plant (Celanese) is submitting a revision to Site Operating Permit No. O1628. This minor permit revision meets the criteria outlined in 30 TAC §122.215 and the application includes all the information required by 30 TAC §122.216.

Celanese seeks to update the following in the Title V Permit:

- 1) Add new storage tank Unit IDs (under a new Group ID) with 40 CFR 63 Subpart EEEE applicability;
- 2) Update 40 CFR 63 Subpart EEEE loading applicability for existing Unit IDs;
- 3) Add 40 CFR 63 Subpart CC applicability for existing flare;
- 4) Add a new fugitive Unit ID with 40 CFR 63 Subpart H applicability; and
- 5) Update Form OP-PBRSUP to reflect recently registered and unregistered PBRs.

The following forms are included in this submittal:

- OP-2: Application for Permit Revision/Renewal
- OP-SUMR: Individual Unit Summary for Revisions
- OP-REQ3: Applicable Requirements Summary
- OP-UA1: Miscellaneous Unit Attributes
- OP-UA4: Loading/Unloading Operations Attributes
- OP-UA7: Flare Attributes
- OP-UA12: Fugitive Emission Attributes
- OP-PBRSUP: Permits By Rule Supplemental Table
- OP-CRO1: Certification by Responsible Official

If you have any questions about this submittal, please contact me at (979) 216-0375 or via email at [jennifer.ashcraft@celanese.com](mailto:jennifer.ashcraft@celanese.com).

Sincerely,

A handwritten signature in black ink that reads "Jennifer Ashcraft". The signature is written in a cursive style with a large initial "J".

Jennifer Ashcraft  
Environmental Manager  
Celanese Ltd. Bay City Plant

Attachments

cc: Air Section Manager, TCEQ Region 12, 5425 Polk St, Ste H, Houston TX 77023-1452  
*Electronic Submittal to* [R12APDMail@tceq.texas.gov](mailto:R12APDMail@tceq.texas.gov)

EPA Region 6  
*Electronic Submittal to* [R6AirPermitsTX@epa.gov](mailto:R6AirPermitsTX@epa.gov)

**Application for Permit Revision  
FOP O1628  
Celanese Ltd Bay City Plant**

**Federal Operating Permit Program**  
**Application for Permit Revision/Renewal**  
**Form OP-2 - Table 1**  
**Texas Commission on Environmental Quality**

<b>Date:</b>	12/30/2024		
<b>Permit No.:</b>	O1628		
<b>Regulated Entity No.:</b>	100258060		
<b>Company / Area Name:</b>	Celanese Ltd. / Bay City Plant		
<b>For Submissions to EPA</b>			
Has a copy of this application been submitted (or is being submitted) to EPA?			<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
<b>I. Application Type</b>			
Indicate the type of application:			
<input type="checkbox"/> Renewal			
<input checked="" type="checkbox"/> Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)			
<input type="checkbox"/> Significant Revision			
<input type="checkbox"/> Revision Requesting Prior Approval			
<input type="checkbox"/> Administrative Revision			
<input type="checkbox"/> Response to Reopening			
<b>II. Qualification Statement</b>			
For SOP Revisions Only			<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
For GOP Revisions Only			<input type="checkbox"/> YES <input type="checkbox"/> NO

**Federal Operating Permit Program  
 Application for Permit Revision/Renewal  
 Form OP-2 - Table 1 (continued)  
 Texas Commission on Environmental Quality**

<b>III. Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or a change in regulations.)</b>						
Indicate all pollutants for which the site is a major source based on the site's potential to emit after the change is operated:						
<input checked="" type="checkbox"/> VOC	<input type="checkbox"/> NO <sub>x</sub>	<input type="checkbox"/> SO <sub>2</sub>	<input type="checkbox"/> PM <sub>10</sub>	<input type="checkbox"/> CO	<input type="checkbox"/> Pb	<input checked="" type="checkbox"/> HAPs
Other:						
<b>IV. Reference Only Requirements (For reference only)</b>						
Has the applicant paid emissions fees for the most recent agency fiscal year (September 1-August 31)?						
				<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
<b>V. Delinquent Fees and Penalties</b>						
Notice: This form will not be processed until all delinquent fees and/or penalties owed the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and Penalty Protocol.						

**Texas Commission on Environmental Quality**  
**Federal Operating Permit Program**  
**Application for Permit Revision/Renewal**  
**Form OP-2**  
**Table 2**

<b>Date:</b>	12/30/2024
<b>Permit No.:</b>	O1628
<b>Regulated Entity No.:</b>	100258060
<b>Company / Area Name:</b>	Celanese Ltd. / Bay City Plant

Using the table below, provide a description of the revision(s).

Revision No.	Revision Code	Unit/Group/Process			NSR Authorization	Description of Changes and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form(s)		
1	MS-C	Yes	V7033A	OP-SUMR OP-REQ3 OP-UA1	4449	Add new Unit ID to the permit with 40 CFR 63 Subpart EEEE applicability
2	MS-C	Yes	V7033B	OP-SUMR OP-REQ3 OP-UA1	4449	Add new Unit ID to the permit with 40 CFR 63 Subpart EEEE applicability
3	MS-C	Yes	251V1306	OP-SUMR OP-REQ3 OP-UA1	4449	Add new Unit ID to the permit with 40 CFR 63 Subpart EEEE applicability
4	MS-C	Yes	GRP-OLDST5K	OP-SUMR OP-REQ3 OP-UA1	4449	Add storage tanks V7033A, V7033B, and 251V1306 to new Group ID per OP-SUMR Table 2
5	MS-C	No	251DTC	OP-SUMR OP-REQ3 OP-UA1	4449 106.473/09/04/2000	Update unit description as shown on OP-SUMR  Update SOP Index Number from "63-RACK-FLR" to "63G-G1TR" for 40 CFR 63 Subpart G applicability  Remove 'high level' applicability for 40 CFR 63, Subpart EEEE loading operations and fugitives per OP-REQ3 Table 2  Add citation-level applicability for 40 CFR 63, Subpart EEEE per OP-UA1 and OP-REQ3 Table 1

**Texas Commission on Environmental Quality**  
**Federal Operating Permit Program**  
**Application for Permit Revision/Renewal**  
**Form OP-2**  
**Table 2**

<b>Date:</b>	12/30/2024
<b>Permit No.:</b>	O1628
<b>Regulated Entity No.:</b>	100258060
<b>Company / Area Name:</b>	Celanese Ltd. / Bay City Plant

Using the table below, provide a description of the revision(s).

Revision No.	Revision Code	Unit/Group/Process			NSR Authorization	Description of Changes and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form(s)		
6	MS-C	No	251DTL	OP-SUMR OP-REQ3 OP-UA1 OP-UA4	4449 106.473/09/04/2000	Update unit description as shown on OP-SUMR  Remove 'high level' applicability for 40 CFR 63, Subpart EEEE loading operations and fugitives per OP-REQ3 Table 2  Remove 40 CFR 63 Subpart G Group 2 Transfer Rack applicability per OP-REQ3 Table 2  Add citation-level applicability for 40 CFR 63, Subpart EEEE per OP-UA1 and OP-REQ3 Table 1  Add 40 CFR 63 Subpart G Group 1 Transfer Rack applicability per OP-UA4
7	MS-C	Yes	251DTL2	OP-SUMR OP-REQ3 OP-UA1 OP-UA4	4449 106.473/09/04/2000 106.261/11/01/2003 [142397] 106.262/11/01/2003 [142397]	Add new Unit ID to the permit with 30 TAC Chapter 115 Loading and 40 CFR 63 Subpart EEEE applicability
8	MS-C	No	251DM1205	OP-REQ3 OP-UA7	4449 106.476/09/04/2000 106.261/11/01/2003 [142397] 106.262/11/01/2003 [142397]	Remove 40 CFR 63 Subpart A applicability per OP-REQ3 Table 2  Add 40 CFR 63 Subpart CC applicability per OP-UA7
9	MS-C	Yes	251F	OP-SUMR OP-REQ3 OP-UA12 OP-PBRSUP	106.261/11/01/2003 [163480] 106.262/11/01/2003 [163480] 106.262/11/01/2003 [176028]	Add new Unit ID to the permit with 40 CFR 63 Subpart H applicability  Add registered PBR to OP-PBRSUP
10	MS-C	No	251DBL	OP-PBRSUP	106.264/09/04/2000 [176303]	Add registered PBR to OP-PBRSUP
11	MS-C	No	TOTES	OP-PBRSUP	106.261/11/01/2003 [176760] 106.262/11/01/2003 [176760]	Add registered PBR to OP-PBRSUP

**Texas Commission on Environmental Quality  
Federal Operating Permit Program  
Individual Unit Summary for Revisions  
Form OP-SUMR  
Table 1**

Date	Permit No.	Regulated Entity No.
12/30/2024	O1628	100258060

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
A	1	V7033A	OP-REQ3 OP-UA1	Storage Tank		4449	
A	2	V7033B	OP-REQ3 OP-UA1	Storage Tank		4449	
A	3	251V1306	OP-REQ3 OP-UA1	Storage Tank		4449	
	5	251DTC	OP-REQ3 OP-UA1	<del>Railcar Loading Rack General</del> Railcar Loading		4449 106.473/09/04/2000	
	6	251DTL	OP-REQ3 OP-UA1	<del>Truck Loading Rack General</del> Large Tank Truck Loading		4449 106.473/09/04/2000	
A	7	251DTL2	OP-REQ3 OP-UA1 OP-UA4	Small Tank Truck Loading		4449 106.473/09/04/2000 106.261/11/01/2003 [142397] 106.262/11/01/2003 [142397]	
A	9	251F	OP-REQ3 OP-UA12	Shipping Equipment Fugitives		106.261/11/01/2003 [163480] 106.262/11/01/2003 [163480] 106.262/11/01/2003 [176028]	

**Texas Commission on Environmental Quality**  
**Federal Operating Permit Program**  
**Individual Unit Summary for Revisions**  
**Form OP-SUMR**  
**Table 2**

Date	Permit No.	Regulated Entity No.
12/30/2024	O1628	100258060

Revision No.	ID No.	Applicable Form	Group AI	Group ID No.
4	V7033A	OP-UA1	A	GRP-OLDST5K
4	V7033B	OP-UA1	A	GRP-OLDST5K
4	251V1306	OP-UA1	A	GRP-OLDST5K

**Applicable Requirements Summary  
Form OP-REQ3 (Page 1)  
Federal Operating Permit Program  
Table 1a: Additions**

Date:	<b>12/30/2024</b>	Regulated Entity No.:	<b>100258060</b>	Permit No.:	<b>O1628</b>
Company Name:	<b>Celanese Ltd.</b>	Area Name:	<b>Bay City Plant</b>		

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
4	GRP-OLDST5K	OP-UA1	63EEEE-2	112(B) HAPS	40 CFR Part 63, Subpart EEEE	§63.2338 §63.2343(a)
5	251DTC	OP-UA1	63EEEE-1	112(B) HAPS	40 CFR Part 63, Subpart EEEE	§63.2338(b)(3) §63.2338(b)(3)(ii) §63.2342(b) §63.2342(b)(1) §63.2342(b)(3)(i) §63.2342(e) §63.2342(e)(3) §63.2342(e)(4) §63.2346(b) §63.2346(b)(1) §63.2346(k) [G]§63.2346(l) §63.2350(a) §63.2350(d) [G]§63.2378(e) [G]§63.2380 §63.982(a)(3)(i) §63.982(b) [G]§63.983 [G]§63.160 [G]§63.670 [G]§63.671

**Applicable Requirements Summary  
Form OP-REQ3 (Page 1)  
Federal Operating Permit Program  
Table 1a: Additions**

Date:	12/30/2024	Regulated Entity No.:	100258060	Permit No.:	01628
Company Name:	Celanese Ltd.	Area Name:	Bay City Plant		

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
6	251DTL	OP-UA1	63EEEE-1	112(B) HAPS	40 CFR Part 63, Subpart EEEE	§63.2338(b)(3) §63.2338(b)(3)(ii) §63.2342(b) §63.2342(b)(1) §63.2342(b)(3)(i) §63.2342(e) §63.2342(e)(3) §63.2342(e)(4) §63.2346(b) §63.2346(b)(1) §63.2346(k) [G]§63.2346(l) §63.2350(a) §63.2350(d) [G]§63.2378(e) [G]§63.2380 §63.982(a)(3)(i) §63.982(b) [G]§63.983 [G]§63.160 [G]§63.670 [G]§63.671

**Applicable Requirements Summary  
Form OP-REQ3 (Page 1)  
Federal Operating Permit Program  
Table 1a: Additions**

Date:	12/30/2024	Regulated Entity No.:	100258060	Permit No.:	01628
Company Name:	Celanese Ltd.	Area Name:	Bay City Plant		

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
6	251DTL	OP-UA4	63G-G1TR	112(B) HAPS	40 CFR Part 63, Subpart G	§ 63.126(a) § 63.11 § 63.126(a)(1) § 63.126(a)(2) § 63.126(a)(3) [G]§ 63.126(b)(2) [G]§ 63.126(d)(3) § 63.126(f) § 63.126(g) § 63.126(h) § 63.172(a) [G]§ 63.172(h) § 63.172(i) § 63.172(m)

**Applicable Requirements Summary  
Form OP-REQ3 (Page 1)  
Federal Operating Permit Program  
Table 1a: Additions**

Date:	<b>12/30/2024</b>	Regulated Entity No.:	<b>100258060</b>	Permit No.:	<b>O1628</b>
Company Name:	<b>Celanese Ltd.</b>	Area Name:	<b>Bay City Plant</b>		

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
7	251DTL2	OP-UA1	63EEEE-1	112(B) HAPS	40 CFR Part 63, Subpart EEEE	§63.2338(b)(3) §63.2338(b)(3)(ii) §63.2342(b) §63.2342(b)(1) §63.2342(b)(3)(i) §63.2342(e) §63.2342(e)(3) §63.2342(e)(4) §63.2346(b) §63.2346(b)(1) §63.2346(k) [G]§63.2346(l) §63.2350(a) §63.2350(d) [G]§63.2378(e) [G]§63.2380 §63.982(a)(3)(i) §63.982(b) [G]§63.983 [G]§63.160 [G]§63.670 [G]§63.671

**Applicable Requirements Summary  
Form OP-REQ3 (Page 1)  
Federal Operating Permit Program  
Table 1a: Additions**

Date:	<b>12/30/2024</b>	Regulated Entity No.:	<b>100258060</b>	Permit No.:	<b>O1628</b>
Company Name:	<b>Celanese Ltd.</b>	Area Name:	<b>Bay City Plant</b>		

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
7	251DTL2	OP-UA4	R5211-CVS	VOC	30 TAC Chapter 115, Loading and Unloading of VOC	§ 115.212(b)(1) § 115.212(b)(1)(A) § 115.212(b)(2) § 115.212(b)(3)(A) § 115.212(b)(3)(A)(ii) § 115.212(b)(3)(B) [G]§ 115.212(b)(3)(C) § 115.212(b)(3)(D) § 115.212(b)(3)(E) § 115.214(b)(1)(B) § 115.214(b)(1)(C) § 60.18

**Applicable Requirements Summary  
Form OP-REQ3 (Page 1)  
Federal Operating Permit Program  
Table 1a: Additions**

Date:	<b>12/30/2024</b>	Regulated Entity No.:	<b>100258060</b>	Permit No.:	<b>O1628</b>
Company Name:	<b>Celanese Ltd.</b>	Area Name:	<b>Bay City Plant</b>		

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
8	251DM1205	OP-UA7	63EEEE-MAX	Opacity	40 CFR Part 63, Subpart CC	§63.670 §63.670(b) §63.670(c) §63.670(d) §63.670(d)(2) §63.670(e) §63.670(o) [G]§63.670(o)(1) [G]§63.670(o)(2) [G]§63.670(o)(3) [G]§63.670(o)(4) [G]§63.670(o)(5) §63.670(o)(6) [G]§63.670(o)(7) [G]§63.671(c)

**Applicable Requirements Summary  
Form OP-REQ3 (Page 1)  
Federal Operating Permit Program  
Table 1a: Additions**

Date:	12/30/2024	Regulated Entity No.:	100258060	Permit No.:	01628
Company Name:	Celanese Ltd.	Area Name:	Bay City Plant		

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
8	251DM1205	OP-UA7	63EEEE-NORM	Opacity	40 CFR Part 63, Subpart CC	§63.670 §63.670(b) §63.670(c) §63.670(d) §63.670(d)(1) §63.670(e) §63.670(o) [G]§63.670(o)(1) [G]§63.670(o)(2) [G]§63.670(o)(3) [G]§63.670(o)(4) [G]§63.670(o)(5) §63.670(o)(6) [G]§63.670(o)(7) [G]§63.671(c)
9	251F	OP-UA12	63H-ALL	112(B) HAPS	40 CFR Part 63, Subpart H	§ 63.162(e) § 63.162(a) § 63.162(c) [G]§ 63.162(g) § 63.162(h)
9	251F	OP-UA12	63H-ALL	112(B) HAPS	40 CFR Part 63, Subpart H	[G]§ 63.164 § 63.162(a) § 63.162(c) [G]§ 63.162(f) [G]§ 63.162(g) § 63.162(h) [G]§ 63.171

**Applicable Requirements Summary  
Form OP-REQ3 (Page 1)  
Federal Operating Permit Program  
Table 1a: Additions**

Date:	<b>12/30/2024</b>	Regulated Entity No.:	<b>100258060</b>	Permit No.:	<b>O1628</b>
Company Name:	<b>Celanese Ltd.</b>	Area Name:	<b>Bay City Plant</b>		

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
9	251F	OP-UA12	63H-ALL	112(B) HAPS	40 CFR Part 63, Subpart H	[G]§ 63.168 § 63.162(a) § 63.162(c) [G]§ 63.162(f) [G]§ 63.162(g) § 63.162(h) [G]§ 63.171 [G]§ 63.175
9	251F	OP-UA12	63H-ALL	112(B) HAPS	40 CFR Part 63, Subpart H	[G]§ 63.167 § 63.162(a) § 63.162(c) [G]§ 63.162(g) § 63.162(h) [G]§ 63.171 [G]§ 63.175
9	251F	OP-UA12	63H-ALL	112(B) HAPS	40 CFR Part 63, Subpart H	[G]§ 63.163 § 63.162(a) § 63.162(c) [G]§ 63.162(f) [G]§ 63.162(g) § 63.162(h) [G]§ 63.171 [G]§ 63.176

**Applicable Requirements Summary  
Form OP-REQ3 (Page 1)  
Federal Operating Permit Program  
Table 1a: Additions**

Date:	<b>12/30/2024</b>	Regulated Entity No.:	<b>100258060</b>	Permit No.:	<b>O1628</b>
Company Name:	<b>Celanese Ltd.</b>	Area Name:	<b>Bay City Plant</b>		

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
9	251F	OP-UA12	63H-ALL	112(B) HAPS	40 CFR Part 63, Subpart H	[G]§ 63.174 § 63.162(a) § 63.162(c) [G]§ 63.162(f) [G]§ 63.162(g) § 63.162(h) [G]§ 63.171
9	251F	OP-UA12	63H-ALL	112(B) HAPS	40 CFR Part 63, Subpart H	[G]§ 63.173 § 63.162(a) § 63.162(c) [G]§ 63.162(f) [G]§ 63.162(g) § 63.162(h) [G]§ 63.171
9	251F	OP-UA12	63H-ALL	112(B) HAPS	40 CFR Part 63, Subpart H	§ 63.170 § 63.162(a) § 63.162(c) [G]§ 63.162(g) § 63.162(h) [G]§ 63.171
9	251F	OP-UA12	63H-ALL	112(B) HAPS	40 CFR Part 63, Subpart H	[G]§ 63.169 § 63.162(a) § 63.162(c) [G]§ 63.162(f) [G]§ 63.162(g) § 63.162(h) [G]§ 63.171

**Applicable Requirements Summary  
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Table 1a: Additions**

Date:	<b>12/30/2024</b>	Regulated Entity No.:	<b>100258060</b>	Permit No.:	<b>O1628</b>
Company Name:	<b>Celanese Ltd.</b>	Area Name:	<b>Bay City Plant</b>		

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
9	251F	OP-UA12	63H-ALL	112(B) HAPS	40 CFR Part 63, Subpart H	[G]§ 63.169 § 63.162(a) § 63.162(c) [G]§ 63.162(f) [G]§ 63.162(g) § 63.162(h) [G]§ 63.171
9	251F	OP-UA12	63H-ALL	112(B) HAPS	40 CFR Part 63, Subpart H	[G]§ 63.165 § 63.162(a) § 63.162(c) [G]§ 63.162(g) § 63.162(h) [G]§ 63.171
9	251F	OP-UA12	63H-ALL	112(B) HAPS	40 CFR Part 63, Subpart H	[G]§ 63.166 § 63.162(a) § 63.162(c) [G]§ 63.162(g) § 63.162(h) [G]§ 63.171
9	251F	OP-UA12	63H-ALL	112(B) HAPS	40 CFR Part 63, Subpart H	[G]§ 63.169 § 63.162(a) § 63.162(c) [G]§ 63.162(f) [G]§ 63.162(g) § 63.162(h) [G]§ 63.171

**Applicable Requirements Summary  
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Federal Operating Permit Program  
Table 1a: Additions**

Date:	<b>12/30/2024</b>	Regulated Entity No.:	<b>100258060</b>	Permit No.:	<b>O1628</b>
Company Name:	<b>Celanese Ltd.</b>	Area Name:	<b>Bay City Plant</b>		

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
9	251F	OP-UA12	63H-ALL	112(B) HAPS	40 CFR Part 63, Subpart H	[G]§ 63.169 § 63.162(a) § 63.162(c) [G]§ 63.162(f) [G]§ 63.162(g) § 63.162(h) [G]§ 63.171
9	251F	OP-UA12	63H-ALL	112(B) HAPS	40 CFR Part 63, Subpart H	[G]§ 63.169 § 63.162(a) § 63.162(c) [G]§ 63.162(f) [G]§ 63.162(g) § 63.162(h) [G]§ 63.171
9	251F	OP-UA12	63H-ALL	112(B) HAPS	40 CFR Part 63, Subpart H	[G]§ 63.169 § 63.162(a) § 63.162(c) [G]§ 63.162(f) [G]§ 63.162(g) § 63.162(h) [G]§ 63.171

**Applicable Requirements Summary  
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Federal Operating Permit Program  
Table 1b: Additions**

Date: <b>12/30/2024</b>	Regulated Entity No.: <b>100258060</b>	Permit No.: <b>O1628</b>
Company Name: <b>Celanese Ltd.</b>	Area Name: <b>Bay City Plant</b>	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
4	GRP-OLDST5K	63EEEE-2	112(B) HAPS	None	§63.2343(a) §63.2390(a)	None
5	251DTC	63EEEE-1	112(B) HAPS	§63.2346(c) §63.2346(d) §63.2346(d)(1) §63.2346(d)(2) §63.2362(b)(1) §63.2362(b)(2)	§63.2343(a) §63.2343(c)(3) §63.2350(c) [G]§63.2390(b) [G]§63.2390(c) §63.2390(d) [G]§63.2390(e) [G]§63.2390(f) §63.2390(g) [G]§63.2390(h) §63.2396(c) §63.2396(c)(1) §63.2396(d)(1) §63.2396(d)(2) §63.2396(d)(3) §63.2396(e) §63.2396(e)(1) §63.2396(e)(2) [G]§63.998(d)(1)	§63.2342(d) §63.2343(c)(c) §63.2343(c)(1)(i) §63.2343(c)(1)(ii)(A) §63.2343(c)(1)(iii) §63.2343(c)(2)(i) §63.2343(c)(2)(ii) §63.2343(d) §63.2343(d)(1) §63.2343(d)(3) §63.2343(d)(4) [G]§63.2382 [G]§63.2386 [G]§63.999(b) [G]§63.999(c)

**Applicable Requirements Summary  
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Table 1b: Additions**

Date: <b>12/30/2024</b>	Regulated Entity No.: <b>100258060</b>	Permit No.: <b>O1628</b>
Company Name: <b>Celanese Ltd.</b>	Area Name: <b>Bay City Plant</b>	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
6	251DTL	63EEEE-1	112(B) HAPS	§63.2346(c) §63.2346(d) §63.2346(d)(1) §63.2346(d)(2) §63.2362(b)(1) §63.2362(b)(2)	§63.2343(a) §63.2343(c)(3) §63.2350(c) [G]§63.2390(b) [G]§63.2390(c) §63.2390(d) [G]§63.2390(e) [G]§63.2390(f) §63.2390(g) [G]§63.2390(h) §63.2396(c) §63.2396(c)(1) §63.2396(d)(1) §63.2396(d)(2) §63.2396(d)(3) §63.2396(e) §63.2396(e)(1) §63.2396(e)(2) [G]§63.998(d)(1)	§63.2342(d) §63.2343(c)(c) §63.2343(c)(1)(i) §63.2343(c)(1)(ii)(A) §63.2343(c)(1)(iii) §63.2343(c)(2)(i) §63.2343(c)(2)(ii) §63.2343(d) §63.2343(d)(1) §63.2343(d)(3) §63.2343(d)(4) [G]§63.2382 [G]§63.2386 [G]§63.999(b) [G]§63.999(c)

**Applicable Requirements Summary  
Form OP-REQ3 (Page 2)  
Federal Operating Permit Program  
Table 1b: Additions**

Date: <b>12/30/2024</b>	Regulated Entity No.: <b>100258060</b>	Permit No.: <b>O1628</b>
Company Name: <b>Celanese Ltd.</b>	Area Name: <b>Bay City Plant</b>	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
6	251DTL	63G-G1TR	112(B) HAPS	[G]§ 63.126(d)(3) § 63.127(a) § 63.127(a)(2) § 63.127(e) [G]§ 63.128(b) § 63.152(g)(1)(i) [G]§ 63.152(g)(1)(ii) § 63.152(g)(1)(iii) § 63.152(g)(1)(iv) [G]§ 63.152(g)(1)(v) [G]§ 63.172(f)(1) [G]§ 63.172(f)(2) § 63.172(g) [G]§ 63.172(h) [G]§ 63.172(k) [G]§ 63.172(l) [G]§ 63.180(b) [G]§ 63.180(d)	§ 63.129(a)(1), [G]§ 63.129(a)(5), § 63.130(a)(1), § 63.130(a)(2)(i), § 63.130(c) § 63.130(e) § 63.130(f),(f)(1)-(3) § 63.130(f)(3)(ii) [G]§ 63.152(a), [G]§ 63.152(f) § 63.152(g)(1), § 63.152(g)(1)(i) [G]§ 63.152(g)(1)(ii) § 63.152(g)(1)(iii)-(iv) [G]§ 63.152(g)(1)(v) [G]§ 63.152(g)(1)(vi) § 63.152(g)(2), § 63.152(g)(2)(i)- (iii) [G]§ 63.172(k) [G]§ 63.172(l) § 63.181(a) [G]§ 63.181(b) § 63.181(c) [G]§ 63.181(d) § 63.181(g), § 63.181(g)(1)(i)-(ii) [G]§ 63.181(g)(2) [G]§ 63.181(g)(3)	§ 63.129(a)(2)-(3), [G]§ 63.129(a)(5) § 63.130(d)(1),(2),(5) [G]§ 63.151(b), [G]§ 63.151(j), [G]§ 63.152(a) § 63.152(b) [G]§ 63.152(b)(1)-(2) § 63.152(b)(4) § 63.152(c)(1)-(2) § 63.152(c)(2)(i) [G]§ 63.152(c)(2)(ii) § 63.152(c)(2)(iii) § 63.152(c)(3) § 63.152(c)(3)(i)-(ii) § 63.152(c)(4)(ii) [G]§ 63.152(c)(6) § 63.152(g)(1) § 63.152(g)(2)(i)-(ii) [G]§ 63.182(a) [G]§ 63.182(b) § 63.182(c) [G]§ 63.182(c)(1) § 63.182(c)(4) [G]§ 63.182(d)

**Applicable Requirements Summary  
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Federal Operating Permit Program  
Table 1b: Additions**

Date: <b>12/30/2024</b>	Regulated Entity No.: <b>100258060</b>	Permit No.: <b>O1628</b>
Company Name: <b>Celanese Ltd.</b>	Area Name: <b>Bay City Plant</b>	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
7	251DTL2	63EEEE-1	112(B) HAPS	§63.2346(c) §63.2346(d) §63.2346(d)(1) §63.2346(d)(2) §63.2362(b)(1) §63.2362(b)(2)	§63.2343(a) §63.2343(c)(3) §63.2350(c) [G]§63.2390(b) [G]§63.2390(c) §63.2390(d) [G]§63.2390(e) [G]§63.2390(f) §63.2390(g) [G]§63.2390(h) §63.2396(c) §63.2396(c)(1) §63.2396(d)(1) §63.2396(d)(2) §63.2396(d)(3) §63.2396(e) §63.2396(e)(1) §63.2396(e)(2) [G]§63.998(d)(1)	§63.2342(d) §63.2343(c)(c) §63.2343(c)(1)(i) §63.2343(c)(1)(ii)(A) §63.2343(c)(1)(iii) §63.2343(c)(2)(i) §63.2343(c)(2)(ii) §63.2343(d) §63.2343(d)(1) §63.2343(d)(3) §63.2343(d)(4) [G]§63.2382 [G]§63.2386 [G]§63.999(b) [G]§63.999(c)

**Applicable Requirements Summary  
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Table 1b: Additions**

Date: <b>12/30/2024</b>	Regulated Entity No.: <b>100258060</b>	Permit No.: <b>01628</b>
Company Name: <b>Celanese Ltd.</b>	Area Name: <b>Bay City Plant</b>	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
7	251DTL2	R5211-CVS	VOC	§ 115.212(b)(3)(B) [G]§ 115.212(b)(3)(C) § 115.214(b)(1)(A) § 115.214(b)(1)(A)(i) § 115.214(b)(1)(A)(ii) § 115.214(b)(1)(A)(iii) § 115.215 § 115.215(1) § 115.215(10) [G]§ 115.215(2) [G]§ 115.215(3) § 115.215(4) § 115.215(5) § 115.215(8) § 115.215(9) § 115.216(1) § 115.216(1)(B)	§ 115.216 § 115.216(1) § 115.216(1)(B) § 115.216(2) § 115.216(3)(A) § 115.216(3)(A)(i) § 115.216(3)(A)(ii) § 115.216(3)(A)(iii) § 115.216(3)(B)	None

**Applicable Requirements Summary  
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Table 1b: Additions**

Date:	<b>12/30/2024</b>	Regulated Entity No.:	<b>100258060</b>	Permit No.:	<b>01628</b>
Company Name:	<b>Celanese Ltd.</b>	Area Name:	<b>Bay City Plant</b>		

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
8	251DM1205	63EEEE-MAX	Opacity	§63.670(b) §63.670(c) §63.670(d)(2) §63.670(e) §63.670(g) [G]§63.670(h) [G]§63.670(i) [G]§63.670(j) [G]§63.670(k) [G]§63.670(l) [G]§63.670(m) [G]§63.671(a) [G]§63.671(b) [G]§63.671(c) [G]§63.671(d) [G]§63.671(e)	[G]§63.670(h) [G]§63.670(i) [G]§63.670(j) [G]§63.670(o)(1) [G]§63.670(o)(5) §63.670(o)(6) §63.670(p) [G]§63.671(a) [G]§63.671(b)	[G]§63.670(h) [G]§63.670(j) [G]§63.670(l) [G]§63.670(o)(2) §63.670(q)

**Applicable Requirements Summary  
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Federal Operating Permit Program  
Table 1b: Additions**

Date: <b>12/30/2024</b>	Regulated Entity No.: <b>100258060</b>	Permit No.: <b>O1628</b>
Company Name: <b>Celanese Ltd.</b>	Area Name: <b>Bay City Plant</b>	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
8	251DM1205	63EEEE-NORM	Opacity	§63.670(b) §63.670(c) §63.670(d)(1) §63.670(e) §63.670(g) [G]§63.670(h) [G]§63.670(i) [G]§63.670(j) [G]§63.670(k) [G]§63.670(m) [G]§63.671(a) [G]§63.671(b) [G]§63.671(c) [G]§63.671(d) [G]§63.671(e)	[G]§63.670(h) [G]§63.670(i) [G]§63.670(j) [G]§63.670(o)(1) [G]§63.670(o)(5) §63.670(o)(6) §63.670(p) [G]§63.671(a) [G]§63.671(b)	[G]§63.670(h) [G]§63.670(j) [G]§63.670(o)(2) §63.670(q)
9	251F	63H-ALL	112(B) HAPS	[G]§ 63.180(d)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c) [G]§ 63.181(i) § 63.181(j)	[G]§ 63.182(a) [G]§ 63.182(b)
9	251F	63H-ALL	112(B) HAPS	[G]§ 63.164 [G]§ 63.180(b) [G]§ 63.180(c) [G]§ 63.180(d)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c) [G]§ 63.181(d) [G]§ 63.181(f)	[G]§ 63.182(a) [G]§ 63.182(b) § 63.182(c) [G]§ 63.182(c)(1) § 63.182(c)(4) [G]§ 63.182(d)

**Applicable Requirements Summary  
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Table 1b: Additions**

Date: <b>12/30/2024</b>	Regulated Entity No.: <b>100258060</b>	Permit No.: <b>O1628</b>
Company Name: <b>Celanese Ltd.</b>	Area Name: <b>Bay City Plant</b>	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
9	251F	63H-ALL	112(B) HAPS	[G]§ 63.168 [G]§ 63.175 [G]§ 63.180(b) [G]§ 63.180(d)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c) [G]§ 63.181(d) § 63.181(h) [G]§ 63.181(h)(1) [G]§ 63.181(h)(2) § 63.181(h)(4) [G]§ 63.181(h)(5) § 63.181(h)(6) § 63.181(h)(7)	[G]§ 63.182(a) [G]§ 63.182(b) § 63.182(c) [G]§ 63.182(c)(1) § 63.182(c)(4) [G]§ 63.182(d)
9	251F	63H-ALL	112(B) HAPS	[G]§ 63.175 [G]§ 63.180(b) [G]§ 63.180(d)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c) § 63.181(h) [G]§ 63.181(h)(1) [G]§ 63.181(h)(2) § 63.181(h)(4) [G]§ 63.181(h)(5) § 63.181(h)(6) § 63.181(h)(7)	[G]§ 63.182(a) [G]§ 63.182(b) § 63.182(c) [G]§ 63.182(c)(1) § 63.182(c)(4) [G]§ 63.182(d)
9	251F	63H-ALL	112(B) HAPS	[G]§ 63.163 [G]§ 63.176 [G]§ 63.180(b) [G]§ 63.180(d)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c) [G]§ 63.181(d) § 63.181(h) [G]§ 63.181(h)(3) § 63.181(h)(4) [G]§ 63.181(h)(5) § 63.181(h)(6) § 63.181(h)(7) § 63.181(h)(8)	[G]§ 63.182(a) [G]§ 63.182(b) § 63.182(c) [G]§ 63.182(c)(1) § 63.182(c)(4) [G]§ 63.182(d)

**Applicable Requirements Summary  
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Federal Operating Permit Program  
Table 1b: Additions**

Date:	<b>12/30/2024</b>	Regulated Entity No.:	<b>100258060</b>	Permit No.:	<b>01628</b>
Company Name:	<b>Celanese Ltd.</b>	Area Name:	<b>Bay City Plant</b>		

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
9	251F	63H-ALL	112(B) HAPS	[G]§ 63.174 [G]§ 63.180(b) [G]§ 63.180(d)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c) [G]§ 63.181(d)	[G]§ 63.182(a) [G]§ 63.182(b) § 63.182(c) [G]§ 63.182(c)(1) § 63.182(c)(4) [G]§ 63.182(d)
9	251F	63H-ALL	112(B) HAPS	[G]§ 63.173 [G]§ 63.180(b) [G]§ 63.180(d)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c) [G]§ 63.181(d)	[G]§ 63.182(a) [G]§ 63.182(b) § 63.182(c) [G]§ 63.182(c)(1) § 63.182(c)(4) [G]§ 63.182(d)
9	251F	63H-ALL	112(B) HAPS	[G]§ 63.180(b) [G]§ 63.180(d)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c)	[G]§ 63.182(a) [G]§ 63.182(b) § 63.182(c) [G]§ 63.182(c)(1) § 63.182(c)(4) [G]§ 63.182(d)
9	251F	63H-ALL	112(B) HAPS	[G]§ 63.169 [G]§ 63.180(b) [G]§ 63.180(d)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c) [G]§ 63.181(d)	[G]§ 63.182(a) [G]§ 63.182(b) § 63.182(c) [G]§ 63.182(c)(1) § 63.182(c)(4) [G]§ 63.182(d)

**Applicable Requirements Summary  
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Table 1b: Additions**

Date: <b>12/30/2024</b>	Regulated Entity No.: <b>100258060</b>	Permit No.: <b>O1628</b>
Company Name: <b>Celanese Ltd.</b>	Area Name: <b>Bay City Plant</b>	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
9	251F	63H-ALL	112(B) HAPS	[G]§ 63.169 [G]§ 63.180(b) [G]§ 63.180(d)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c) [G]§ 63.181(d)	[G]§ 63.182(a) [G]§ 63.182(b) § 63.182(c) [G]§ 63.182(c)(1) § 63.182(c)(4) [G]§ 63.182(d)
9	251F	63H-ALL	112(B) HAPS	[G]§ 63.165 [G]§ 63.180(b) [G]§ 63.180(c) [G]§ 63.180(d)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c) [G]§ 63.181(f)	[G]§ 63.182(a) [G]§ 63.182(b) § 63.182(c) [G]§ 63.182(c)(1) § 63.182(c)(4) [G]§ 63.182(d)
9	251F	63H-ALL	112(B) HAPS	[G]§ 63.180(b) [G]§ 63.180(d)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c) [G]§ 63.181(i)	[G]§ 63.182(a) [G]§ 63.182(b) § 63.182(c) [G]§ 63.182(c)(1) § 63.182(c)(4) [G]§ 63.182(d)
9	251F	63H-ALL	112(B) HAPS	[G]§ 63.169 [G]§ 63.180(b) [G]§ 63.180(d)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c) [G]§ 63.181(d) [G]§ 63.181(i)	[G]§ 63.182(a) [G]§ 63.182(b) § 63.182(c) [G]§ 63.182(c)(1) § 63.182(c)(4) [G]§ 63.182(d)

**Applicable Requirements Summary**  
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**Federal Operating Permit Program**  
**Table 1b: Additions**

Date:	<b>12/30/2024</b>	Regulated Entity No.:	<b>100258060</b>	Permit No.:	<b>O1628</b>
Company Name:	<b>Celanese Ltd.</b>	Area Name:	<b>Bay City Plant</b>		

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
9	251F	63H-ALL	112(B) HAPS	[G]§ 63.169 [G]§ 63.180(b) [G]§ 63.180(d)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c) [G]§ 63.181(d) [G]§ 63.181(i)	[G]§ 63.182(a) [G]§ 63.182(b) § 63.182(c) [G]§ 63.182(c)(1) § 63.182(c)(4) [G]§ 63.182(d)
9	251F	63H-ALL	112(B) HAPS	[G]§ 63.169 [G]§ 63.180(b) [G]§ 63.180(d)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c) [G]§ 63.181(d) [G]§ 63.181(i)	[G]§ 63.182(a) [G]§ 63.182(b) § 63.182(c) [G]§ 63.182(c)(1) § 63.182(c)(4) [G]§ 63.182(d)
9	251F	63H-ALL	112(B) HAPS	[G]§ 63.169 [G]§ 63.180(b) [G]§ 63.180(d)	§ 63.181(a) [G]§ 63.181(b) § 63.181(c) [G]§ 63.181(d) [G]§ 63.181(i)	[G]§ 63.182(a) [G]§ 63.182(b) § 63.182(c) [G]§ 63.182(c)(1) § 63.182(c)(4) [G]§ 63.182(d)

**Applicable Requirements Summary  
Federal Operating Permit Program  
Form OP-REQ3 (Page 3)  
Table 2a: Deletions**

Date:	12/30/2024	Regulated Entity No.:	100258060	Permit No.:	O1628
Company Name:	Celanese Ltd.			Area Name:	Bay City Plant

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
5	251DTC	OP-UA1	63EEEE-1	112(B) HAPS	40 CFR Part 63, Subpart EEEE	§ 63.2338(b) The permit holder shall comply with the applicable limitation, standard and/or equipment specification requirements of 40 CFR Part 63, Subpart EEEE
5	251DTC	OP-UA1	63EEEE-1	112(B) HAPS	40 CFR Part 63, Subpart EEEE	§ 63.2338(b) The permit holder shall comply with the applicable limitation, standard and/or equipment specification requirements of 40 CFR Part 63, Subpart EEEE
6	251DTL	OP-UA1	63EEEE-1	112(B) HAPS	40 CFR Part 63, Subpart EEEE	§ 63.2338(b) The permit holder shall comply with the applicable limitation, standard and/or equipment specification requirements of 40 CFR Part 63, Subpart EEEE
6	251DTL	OP-UA1	63EEEE-1	112(B) HAPS	40 CFR Part 63, Subpart EEEE	§ 63.2338(b) The permit holder shall comply with the applicable limitation, standard and/or equipment specification requirements of 40 CFR Part 63, Subpart EEEE

**Applicable Requirements Summary  
Federal Operating Permit Program  
Form OP-REQ3 (Page 3)  
Table 2a: Deletions**

Date:	12/30/2024	Regulated Entity No.:	100258060	Permit No.:	O1628
Company Name:	Celanese Ltd.			Area Name:	Bay City Plant

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
6	251DTL	OP-UA4	63G-RACK-GRP2	112(B) HAPS	40 CFR Part 63, Subpart G	§63.126(c)
8	251DM1205	OP-UA7	63A-AIR	112(B) HAPS	40 CFR Part 63, Subpart A	§ 63.11(b)(4) § 63.11(b)(1) § 63.11(b)(2) § 63.11(b)(3) § 63.11(b)(5) § 63.11(b)(6)(ii) § 63.11(b)(8)

**Applicable Requirements Summary  
Form OP-REQ3 (Page 4)  
Federal Operating Permit Program  
Table 2b: Deletions**

Date: <b>12/30/2024</b>	Regulated Entity No.: <b>100258060</b>	Permit No.: <b>O1628</b>
Company Name: <b>Celanese Ltd.</b>		Area Name: <b>Bay City Plant</b>

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
5	251DTC	OP-UA1	63EEEE-1	112(B) HAPS	The permit holder shall comply with the applicable monitoring and testing requirements of 40 CFR Part 63, Subpart EEEE	The permit holder shall comply with the applicable recordkeeping requirements of 40 CFR Part 63, Subpart EEEE	The permit holder shall comply with the applicable reporting requirements of 40 CFR Part 63, Subpart EEEE
5	251DTC	OP-UA1	63EEEE-1	112(B) HAPS	The permit holder shall comply with the applicable monitoring and testing requirements of 40 CFR Part 63, Subpart EEEE	The permit holder shall comply with the applicable recordkeeping requirements of 40 CFR Part 63, Subpart EEEE	The permit holder shall comply with the applicable reporting requirements of 40 CFR Part 63, Subpart EEEE
6	251DTL	OP-UA1	63EEEE-1	112(B) HAPS	The permit holder shall comply with the applicable monitoring and testing requirements of 40 CFR Part 63, Subpart EEEE	The permit holder shall comply with the applicable recordkeeping requirements of 40 CFR Part 63, Subpart EEEE	The permit holder shall comply with the applicable reporting requirements of 40 CFR Part 63, Subpart EEEE
6	251DTL	OP-UA1	63EEEE-1	112(B) HAPS	The permit holder shall comply with the applicable monitoring and testing requirements of 40 CFR Part 63, Subpart EEEE	The permit holder shall comply with the applicable recordkeeping requirements of 40 CFR Part 63, Subpart EEEE	The permit holder shall comply with the applicable reporting requirements of 40 CFR Part 63, Subpart EEEE

**Applicable Requirements Summary  
Form OP-REQ3 (Page 4)  
Federal Operating Permit Program  
Table 2b: Deletions**

Date: <b>12/30/2024</b>	Regulated Entity No.: <b>100258060</b>	Permit No.: <b>O1628</b>
Company Name: <b>Celanese Ltd.</b>		Area Name: <b>Bay City Plant</b>

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
6	251DTL	OP-UA4	63G-RACK-GRP2	112(B) HAPS	None	§63.130(f) §63.130(f)(1) §63.130(f)(2) §63.130(f)(3) §63.130(f)(3)(i) §63.130(f)(3)(ii)	§63.152(c)(4)(iii)
8	251DM1205	OP-UA7	63A-AIR	112(B) HAPS	§ 63.11(b)(4) § 63.11(b)(5)	None	None

**Texas Commission on Environmental Quality  
Miscellaneous Unit Attributes  
Form OP-UA1 (Page 1)  
Federal Operating Permit Program**

<b>Date:</b>	12/30/2024
<b>Permit No.:</b>	O1628
<b>Regulated Entity No.:</b>	100258060

Unit ID No.	SOP/GOP Index No.	Unit Type	Date Constructed/Placed in Service	Functionally Identical Replacement	Maximum Rated Capacity	Technical Information and Unit Description
V7033A	63EEEE-2	EP				Storage tank less than 5,000 gallon capacity; subject to 40 CFR 63 Subpart EEEE recordkeeping requirements.
V7033B	63EEEE-2	EP				Storage tank less than 5,000 gallon capacity; subject to 40 CFR 63 Subpart EEEE recordkeeping requirements.
251V1306	63EEEE-2	EP				Storage tank less than 5,000 gallon capacity; subject to 40 CFR 63 Subpart EEEE recordkeeping requirements.
251DTC	63EEEE-1	EP				Transfer rack subject to 40 CFR 63 Subpart EEEE loading control requirements and associated equipment leak component requirements.
251DTL	63EEEE-1	EP				Transfer rack subject to 40 CFR 63 Subpart EEEE loading control requirements and associated equipment leak component requirements.
251DTL2	63EEEE-1	EP				Transfer rack subject to 40 CFR 63 Subpart EEEE loading control requirements and associated equipment leak component requirements.























**Permit By Rule Supplemental Table (Page 1)**  
**Table A: Registered Permits By Rule (30 TAC Chapter 106) for the Application Area**  
**Texas Commission on Environmental Quality**

Date	Permit Number	Regulated Entity Number
12/30/2024	O1628	100258060

Unit ID No.	Registration No.	PBR No.	Registration Date
110BLD134	79034	106.261,106.262	3/8/2019
110BLD135	79034	106.261,106.262	3/8/2019
110BLD136	79034	106.261,106.262	3/8/2019
110F	151911	106.261,106.262	6/8/2018
110F	164900	106.261,106.262	5/24/2021
110F	172702	106.262	5/23/2023
110T127	172702	106.262	5/23/2023
251CV811	172702	106.262	5/23/2023
251DBL	176303	106.264	5/13/2024

**Permit By Rule Supplemental Table (Page 1)**  
**Table A: Registered Permits By Rule (30 TAC Chapter 106) for the Application Area**  
**Texas Commission on Environmental Quality**

Date	Permit Number	Regulated Entity Number
12/30/2024	O1628	100258060

Unit ID No.	Registration No.	PBR No.	Registration Date
251DM1205	142397	106.261,106.262	9/19/2016
251DM2224	163480	106.261,106.262	1/12/2021
251DTL2	142397	106.261,106.262	9/19/2016
251F	163480	106.261,106.262	1/12/2021
251F	176028	106.262	4/16/2024
251V1306	163480	106.261,106.262	1/12/2021
TOTES	176760	106.261,106.262	7/23/2024

**Permit By Rule Supplemental Table (Page 2)**  
**Table B: Claimed (not registered) Permits By Rule (30 TAC Chapter 106) for the Application Area**  
**Texas Commission on Environmental Quality**

<b>Date</b>	<b>Permit Number</b>	<b>Regulated Entity Number</b>
12/30/2024	O1628	100258060

<b>Unit ID No.</b>	<b>PBR No.</b>	<b>Version No./Date</b>
110F	106.263	9/4/2000
110F	106.472	3/14/1997; 9/4/2000
251DM1205	106.476	9/4/2000
251DTC	106.473	9/4/2000
251DTL	106.473	9/4/2000
251DTL2	106.473	9/4/2000
251M2564	106.472	3/14/1997; 9/4/2000
301M150	106.371	3/14/1997; 9/4/2000

**Permit By Rule Supplemental Table (Page 2)**  
**Table B: Claimed (not registered) Permits By Rule (30 TAC Chapter 106) for the Application Area**  
**Texas Commission on Environmental Quality**

Date	Permit Number	Regulated Entity Number
12/30/2024	O1628	100258060

Unit ID No.	PBR No.	Version No./Date
BOILER	106.183	3/14/1997; 9/4/2000
CT_TRTMT	106.371	9/4/2000
ENGINE A	106.263	9/4/2000
ENGINE B	106.263	9/4/2000
ENGINE C	106.263	9/4/2000
TEMPENG	106.263	9/4/2000

**Permit By Rule Supplemental Table (Page 3)**

**Table C: Claimed (not registered) Permits By Rule (30 TAC Chapter 106) for Insignificant Sources for the Application Area  
Texas Commission on Environmental Quality**

Date	Permit Number	Regulated Entity Number
12/30/2024	O1628	100258060

PBR No.	Version No./Date
106.102	09/04/2000
106.122	09/04/2000
106.266	09/04/2000

**Permit By Rule Supplemental Table (Page 4)**  
**Table D: Monitoring Requirements for Registered and Claimed PBRs for the Application Area**  
**Texas Commission on Environmental Quality**

Date	Permit Number	Regulated Entity Number
12/30/2024	O1628	100258060

Unit ID No.	PBR No.	Version No./Date or Registration No.	Monitoring Requirement
110BLD134	106.261,106.262	79034	Maintain records demonstrating annual and hourly emissions
110BLD135	106.261,106.262	79034	Maintain records demonstrating annual and hourly emissions
110BLD136	106.261,106.262	79034	Maintain records demonstrating annual and hourly emissions
110F	106.261,106.262	151911	Maintain records demonstrating annual and hourly emissions
110F	106.261,106.262	164900	Maintain records demonstrating annual and hourly emissions
110F	106.262	172702	Maintain records demonstrating annual and hourly emissions
110F	106.263	09/04/2000	Maintain records demonstrating annual and hourly emissions

**Permit By Rule Supplemental Table (Page 4)**  
**Table D: Monitoring Requirements for Registered and Claimed PBRs for the Application Area**  
**Texas Commission on Environmental Quality**

Date	Permit Number	Regulated Entity Number
12/30/2024	O1628	100258060

Unit ID No.	PBR No.	Version No./Date or Registration No.	Monitoring Requirement
110F	106.472	3/14/1997; 9/4/2000	Monitor for visible emissions
110T127	106.262	172702	Maintain records demonstrating annual and hourly emissions
251CV811	106.262	172702	Maintain records demonstrating annual and hourly emissions
251DBL	106.264	176303	Maintain records to demonstrate replacement facility functions in similar manner replacement; emissions are not more than nor different from replacement and will not exceed 25 TPY of any air contaminant; physical location of replacement is same as replacement; there will be no increase in capacity, production rate, or throughput; emissions will not contain any compounds (other than carbon monoxide, nitrogen oxide, or sulfur dioxide) listed as hazardous constituents in 40 CFR 261, Appendix VIII.

**Permit By Rule Supplemental Table (Page 4)**  
**Table D: Monitoring Requirements for Registered and Claimed PBRs for the Application Area**  
**Texas Commission on Environmental Quality**

Date	Permit Number	Regulated Entity Number
12/30/2024	O1628	100258060

Unit ID No.	PBR No.	Version No./Date or Registration No.	Monitoring Requirement
251DM1205	106.261,106.262	142397	Maintain records demonstrating annual and hourly emissions
251DM1205	106.476	09/04/2000	Measure net heating value and maintain >200 BTU/scf
251DM2224	106.261,106.262	163480	Maintain records demonstrating annual and hourly emissions
251DTC	106.473	09/04/2000	Document tank capacity < 25,000 gallons
251DTL	106.473	09/04/2000	Document tank capacity < 25,000 gallons
251DTL2	106.261,106.262	142397	Maintain records demonstrating annual and hourly emissions

**Permit By Rule Supplemental Table (Page 4)**  
**Table D: Monitoring Requirements for Registered and Claimed PBRs for the Application Area**  
**Texas Commission on Environmental Quality**

Date	Permit Number	Regulated Entity Number
12/30/2024	O1628	100258060

Unit ID No.	PBR No.	Version No./Date or Registration No.	Monitoring Requirement
251DTL2	106.473	09/04/2000	Document tank capacity < 25,000 gallons
251F	106.261,106.262	163480	Maintain records demonstrating annual and hourly emissions
251F	106.262	176028	Maintain records demonstrating annual and hourly emissions
251M2564	106.472	3/14/1997; 9/4/2000	Monitor for visible emissions
251V1306	106.261,106.262	163480	Maintain records demonstrating annual and hourly emissions

**Permit By Rule Supplemental Table (Page 4)**  
**Table D: Monitoring Requirements for Registered and Claimed PBRs for the Application Area**  
**Texas Commission on Environmental Quality**

Date	Permit Number	Regulated Entity Number
12/30/2024	O1628	100258060

Unit ID No.	PBR No.	Version No./Date or Registration No.	Monitoring Requirement
301M150	106.371	3/14/1997; 9/4/2000	Cooling water not in direct contact with process streams containing carbon compounds, sulfur compounds, halogens or halogen compounds, cyanide compounds, inorganic acids, or acid gases
BOILER	106.183	3/14/1997; 9/4/2000	Maintain information that unit is rated <40MMBtu/hr, fuel records of fuel fired, and sulfur content of fuel
CT_TRTMT	106.371	09/04/2000	Maintain records of water treating systems for process cooling water
ENGINE A	106.263	09/04/2000	Maintain records demonstrating annual and hourly emissions
ENGINE B	106.263	09/04/2000	Maintain records demonstrating annual and hourly emissions

**Permit By Rule Supplemental Table (Page 4)**  
**Table D: Monitoring Requirements for Registered and Claimed PBRs for the Application Area**  
**Texas Commission on Environmental Quality**

<b>Date</b>	<b>Permit Number</b>	<b>Regulated Entity Number</b>
12/30/2024	O1628	100258060

<b>Unit ID No.</b>	<b>PBR No.</b>	<b>Version No./Date or Registration No.</b>	<b>Monitoring Requirement</b>
ENGINE C	106.263	09/04/2000	Maintain records demonstrating annual and hourly emissions
TEMPENG	106.263	09/04/2000	Maintain records demonstrating annual and hourly emissions
TOTES	106.261,106.262	176760	Maintain records demonstrating annual and hourly emissions

**Form OP-CRO1**  
**Certification by Responsible Official**  
**Federal Operating Permit Program**  
**Texas Commission on Environmental Quality**

All initial issuance, revision, renewal, and reopening permit application submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

<b>I. Identifying Information</b>	
RN: RN100258060	
CN: CN600130850	
Account No.: MH0009H	
Permit No.: O1628	
Project No.:	
Area Name: Bay City Plant	
Company Name: Celanese Ltd	
<b>II. Certification Type</b> <i>(Please mark appropriate box)</i>	
<input checked="" type="checkbox"/> Responsible Official Representative	<input type="checkbox"/> Duly Authorized Representative
<b>III. Submittal Type</b> <i>(Please mark appropriate box) (Only one response can be accepted per form)</i>	
<input type="checkbox"/> SOP/TOP Initial Permit Application	<input checked="" type="checkbox"/> Permit Revision, Renewal, or Reopening
<input type="checkbox"/> GOP Initial Permit Application	<input type="checkbox"/> Update to Permit Application
<input type="checkbox"/> Other:	

**Form OP-CRO1**  
**Certification by Responsible Official**  
**Federal Operating Permit Program**  
**Texas Commission on Environmental Quality**

<b>IV. Certification of Truth</b>	
<b>This certification does not extend to information which is designated by TCEQ as information for reference only.</b>	
I, <u>Donald Berthelot</u>	certify that I am the <u>[REDACTED]</u>
<i>(Certifier Name printed or typed)</i>	<i>(RO or DAR)</i>
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete: <i>Note: Enter Either a Time Period or Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>	
Time Period: From _____ to _____ <span style="display: block; text-align: center;"><i>(Start Date)</i> <span style="margin-left: 200px;"><i>(End Date)</i></span></span>	
Specific Dates: <u>12/27/2024</u>	
<i>(Date 1)</i>	<i>(Date 2)</i>
<i>(Date 3)</i>	<i>(Date 4)</i>
<i>(Date 5)</i>	<i>(Date 6)</i>
Signature: <u></u>	Signature Date: <u>12-28-2024</u>
Title: <u>Director Production</u>	